

General Plan Update 2035



CITY OF WOODLAND

# 2035 General Plan and Climate Action Plan Final Environmental Impact Report



JANUARY 2017





NOTICE OF AVAILABILITY of the  
FINAL ENVIRONMENTAL IMPACT REPORT for the  
DRAFT 2035 GENERAL PLAN and DRAFT 2035 CLIMATE ACTION PLAN  
for the CITY OF WOODLAND

DATE: January 23, 2017  
TO: Interested Agencies and Individuals  
FROM: Woodland Community Development Department

The Final Environmental Impact Report (FEIR) (SCH # 2013032015) for the Draft 2035 General Plan and Draft 2035 Climate Action Plan (CAP) is now available for review. More information is provided below.

The Proposed Project is adoption of a new general plan and CAP for the City of Woodland. These documents will apply to the entire incorporated area of the City (totaling 9,619 acres) and land outside of the current City limits but within the Planning Area (totaling 3,162 acres) upon annexation. The 12,781-acre Planning Area is identical to the Urban Limit Line (ULL) established by City of Woodland voters in 2006.

The FEIR includes the Draft EIR, a copy of each comment on the Draft EIR received by the City within the comment period for the Draft EIR (which ended on November 3, 2016), responses to comments on environmental issues raised in those comments, and corrections and clarifications to the Draft EIR.

The FEIR is now available for public review online at the web link listed below or in printed form via "loaner" copies at the public counter of the City's Community Development Department at 300 First Street, Woodland, CA 95695. The document is also available for public review at the Woodland Public Library, 250 First St, Woodland, and online at:

[http://cityofwoodland.org/gov/depts/cd/woodland\\_general\\_plan\\_2035/default.asp](http://cityofwoodland.org/gov/depts/cd/woodland_general_plan_2035/default.asp)

Interested parties may purchase printed or electronic copies (USB flash drive) from the Community Development Department. Contact (530) 661-5820 for a schedule of costs.

Public hearings to consider certification of the FEIR and adoption of the General Plan and CAP will be held before the Planning Commission and City Council in the coming months. Separate public notice for these meetings and hearings will be distributed once precise dates have been determined. For more information about the General Plan, CAP, or EIR, please visit the City's General Plan Update website at the web address provided above or contact:

[GeneralPlan2035@cityofwoodland.org](mailto:GeneralPlan2035@cityofwoodland.org)

Cindy Norris, Principal Planner  
Woodland Community Development Department  
300 First Street  
Woodland, CA 95695  
(530) 661-5820

Thank you.



# General Plan Update 2035



CITY OF WOODLAND

## 2035 General Plan and Climate Action Plan Final Environmental Impact Report

State Clearinghouse Number 2013032015

January 2017

Prepared for:

City of Woodland  
Community Development Department  
300 First Street  
Woodland, CA 95695



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## ACRONYMS AND OTHER ABBREVIATIONS

2035 CAP	Draft 2035 Climate Action Plan
2035 General Plan	Draft 2035 General Plan
AB	Assembly Bill
AQAP	Air Quality Attainment Plan
AR5	5th Assessment Report
Cal FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CCAA	California Clean Air Act
CEQA	California Environmental Quality Act
City	City of Woodland
CO <sub>2</sub>	carbon dioxide
County	Yolo County
CPG	Conaway Preservation Group
DEIR	Draft Environmental Impact Report
DWR	California Department of Water Resources
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
FY	fiscal year
GHG	greenhouse gas
GPC	Greenhouse Gas Emission Inventories
HCP/NCCP	Habitat Conservation Plan/Natural Communities Conservation Plan
LAFCO	Local Agency Formation Commission
MT CO <sub>2</sub> e/SP	metric tons of carbon dioxide equivalent per service population
MTP	Metropolitan Transportation Plan
N <sub>2</sub> O	nitrous oxide
NAHC	Native American Heritage Commission
NFIP	National Flood Insurance Program
NOP	Notice of Preparation
OPR	Office of Planning and Research
Porter-Cologne Act	Porter-Cologne Water Quality Control Act
PV	photovoltaic
RPS	Renewables Portfolio Standard
SACOG	Sacramento Council of Governments
SB	Senate Bill
SCS	Sustainable Communities Strategy
SMAQMD	Sacramento Metropolitan Air Quality Management District
SOI	Sphere of Influence
SP	Specific Plan
ULL	Urban Limit Line
USACE	U.S. Army Corps of Engineers
VMT	vehicles miles travelled
WPCF	Water Pollution Control Facility
YCTD	Yolo County Transportation District
YSAQMD	Yolo-Solano Air Quality Management District

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# 1 INTRODUCTION

The City of Woodland (the City) has directed the preparation of an Environmental Impact Report (EIR) to evaluate the impacts of the Draft 2035 General Plan (2035 General Plan) and Draft 2035 Climate Action Plan (2035 CAP), collectively referred to as the Proposed Project. The EIR was prepared in compliance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.).

## 1.1 PUBLIC REVIEW AND INPUT

The City encouraged review and input on the Draft EIR through a variety of means and has considered this input in developing the Final EIR.

As described in Section 1.7 of the Draft EIR, the City circulated a Notice of Preparation (NOP) dated March 6, 2013 to government agencies, special service districts, organizations, and individuals with an interest in or jurisdiction over the project. The NOP is a brief notice sent by the lead agency to inform the public, interested parties, responsible agencies, trustee agencies, and potentially affected federal, state, and local agencies that the lead agency plans to prepare an EIR. The NOP also seeks comments regarding the scope and content of the EIR. The City held a public scoping meeting for the project on March 21, 2013. The City subsequently released an updated NOP to provide interested parties with an additional opportunity to comment on the scope and content of the environmental analysis. The Updated NOP was released on May 23, 2016. The NOP comment letters and comments at the scoping meeting were used to finalize the scope of analysis for the EIR.

The City sent the NOP to the Cortina Band of Indians and Yocha Dehe Wintun Nation on March 6, 2013. The comment period ended April 5, 2013. No comments were received from either tribe. Subsequently in early 2016, for the purposes of the mandatory Housing Element update, the Native American Heritage Commission (NAHC) was queried regarding tribes with traditional lands or cultural places within the City limits. On March 14, 2016, the NAHC identified the Cortina Band of Indians and Yocha Dehe Wintun Nation. On May 10, 2013 the City sent letters to both tribes via certified mail offering the opportunity to consult for the purpose of identifying and preserving or mitigating impacts to cultural resources on land potentially affected by the Draft Housing Element. As described in Section 1.8 of the Draft EIR, the City subsequently received inquiries from three tribes pursuant to Public Resources Code Section 21080.3.1 (Assembly Bill 52, Statutes of 2014) related to tribal cultural resources. The General Plan update precedes the requirements of AB 52. However, the City added the three tribes to the General Plan mailing list. The City sent the updated NOP to all five tribes on May 23, 2016. The comment period for the updated NOP ended June 24, 2016. One tribal response was received.

The City received a letter dated June 16, 2016 from a representative of the Yocha Dehe Wintun Nation thanking the City for the notification letter, identifying that the Planning Area is within an area of cultural interest to the Yocha Dehe Wintun Nation, and requesting a project timeline, detailed project information, and the latest cultural study. New contact information was also provided. On July 19, 2016, the City sent email communication to the Native American Tribal representative of the Yocha Dehe Wintun Nation with an update on the project timeline, links to information about the 2035 General Plan, and inviting input. The email also noted that the 2035 EIR and 2035 CAP would be circulated for public review, and that the City is available to meet to discuss any input at the convenience of the Native American Tribal representative.

As described in Section 1.12 of the Draft EIR, the City also made available copies of the 2035 General Plan, the 2035 CAP, and the Draft EIR for review through the City of Woodland Community Development Department. The City also circulated the document to public agencies, other public and private organizations, property owners, developers, and other interested individuals. Documents were also posted to the City’s website to solicit further review and input. As detailed in Chapter 2 of this Final EIR, the City received written and oral comments on the Draft EIR and has provided written responses to comments on environmental issues received from reviewers of the Draft EIR.

## 1.2 CONTENTS OF THE FINAL EIR

The Final EIR includes:

- ▶ The Draft EIR (State Clearinghouse Number 2013032015), which was received on September 19, 2016 by the State Clearinghouse, and circulated for a 45-day public review period that ended on November 3, 2016;
- ▶ The City’s response to each comment received on the Draft EIR; and
- ▶ A list of modifications to the Draft EIR.

In accordance with Section 15088 of the CEQA Guidelines, the City, as the lead agency, has reviewed the comments received on the Draft EIR for the 2035 General Plan and has prepared written responses to the comments received. Chapter 2 of this Final EIR includes the written and oral comments received on the Draft EIR and presents responses to these comments (as required by the CEQA Guidelines Section 15132). The focus of the responses to comments is on the disposition of significant environmental issues that are raised in the comments, as specified by Section 15088(c) of the CEQA Guidelines. Detailed responses are not provided to comments on the 2035 General Plan that do not pertain to the adequacy of the Draft EIR in addressing adverse physical environmental impacts. This type of comment is being considered outside of the CEQA process, as described below.

In some instances, responses to comments may warrant modification of the text of the Draft EIR. In those cases, the text of the Draft EIR is revised and the changes compiled in Chapter 3, Revisions to the Draft EIR. The text deletions are shown in ~~strikeout~~ (strikeout) and additions are shown in underline (underline).

Chapter 4 is the Mitigation Monitoring and Reporting Program. Where a CEQA document has identified significant environmental effects, Public Resources Code Section 21081.6 requires adoption of a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of a project approval to mitigate or avoid significant effects on the environment.” Section 15097(b) of the CEQA Guidelines notes that when the project examined in an EIR is a general plan, specific plan, community plan, or other plan-level document (such as a climate action plan), the monitoring plan may consist of policies in the plan-level documents.

The City has also reviewed, and has in some cases made revisions to the 2035 General Plan and 2035 CAP in response to comments received on those documents. Summary responses and revisions to the 2035 General Plan and 2035 CAP made as a result of comments received on these documents will be released under separate cover and will be made available for review through the Community Development Department, 300 First Street, in Woodland.

### 1.3 USE OF THE FINAL EIR

The Final EIR allows the public and the City an opportunity to review revisions to the Draft EIR and the responses to comments. The Final EIR serves as the environmental document to inform the City Council's consideration of the Proposed Project, either in whole or in part.

As required by Section 15090(a)(1)-(3) of the CEQA Guidelines, a lead agency, in certifying a Final EIR, must make the following three determinations:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision-making body of the lead agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the lead agency's independent judgment and analysis.

As required by Section 15091 of the CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The possible findings are:

1. Changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

In addition, as described in Section 15092 of the CEQA Guidelines, the City may not carry out a project for which an EIR was prepared unless the following additional Findings of Fact are made:

1. The project as approved will not have a significant effect on the environment, or
2. The agency has:
  - a. Eliminated or substantially lessened all significant effects on the environment where feasible as shown in findings under Section 15091, and
  - b. Determined that any remaining significant effects on the environment found to be unavoidable under Section 15091 are acceptable due to overriding concerns as described in Section 15093.

Finally, with regard to the overriding concerns described above for significant and unavoidable impacts, CEQA Guidelines Section 15093 requires lead agencies to balance environmental impacts with economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits of a proposed project. If the benefits outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable. If there are significant and unavoidable environmental impacts and the lead agency wishes to approve a project, the lead agency must state the reasons for approval in writing.

## 2 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

This section of the Final EIR contains comment letters received during the public review period for the Draft EIR. In conformance with CEQA Guidelines Section 15088(a), written responses to comments on environmental issues received from reviewers of the Draft EIR were prepared, including both written and oral comments.

### 2.1 COMMENTS ON THE DRAFT EIR

Table 2-1 identifies a number for each comment letter received, the author of the comment letter, and the date of the comment letter. Each comment letter is included in its entirety for decision maker consideration before each response.

Letter #	Commenter	Date
1	Yolo Local Agency Formation Commission (LAFCo)	10/12/2016
2	California Department of Forestry and Fire Protection (Cal FIRE)	10/17/2016
3	Yolo-Solano Air Quality Management District (YSAQMD)	10/17/2016
4	Federal Emergency Management Agency (FEMA)	10/19/2016
5	City Staff Notes Summarizing Oral Comments Made During October 20, 2016 Planning Commission Public Comment Hearing	10/20/2016
6	C. K. Shewmaker	10/23/2016
7	Glen and Bruce Barton	10/24/2016
8	Yolo County Farm Bureau	10/26/2016
9	Development Advisory Services	11/03/2016
10	Hefner Law/Eastland Ventures	11/03/2016
11	California Department of Transportation (Caltrans)	11/03/2016
12	Governor’s Office of Planning and Research (OPR)	11/03/2016
13	OPR	11/04/2016

### 2.2 RESPONSE TO COMMENTS

This section of the Final EIR contains comment letters received during the public review period for the Draft EIR and responses to these comments.

Consistent with CEQA Guidelines Section 15088(a), written responses to comments on environmental issues received from reviewers of the Draft EIR were prepared, including both written and oral comments. The focus is on comments pertaining to the adequacy of the EIR for addressing potential adverse physical environmental impacts associated with implementation of the Proposed Project.

## 2.3 COMMENT LETTER #01

01

YOLO  
LOCAL  
AGENCY  
FORMATION  
COMMISSION



October 12, 2016

Cindy Norris, Principal Planner  
Woodland City Community Development Department  
300 First Street  
Woodland CA 95695

Re: Comments on the City of Woodland Draft 2035 General Plan Update Draft  
Environmental Impact Report (DEIR) SCH# 2013032015

Dear Ms. Norris:

Thank you for the opportunity to review the DEIR for the City of Woodland Draft 2035 General Plan Update and Climate Action Plan. As you know, LAFCo is a responsible agency and it would use the EIR to process anticipated sphere of influence amendments and annexations to implement the City's General Plan. Correspondingly, LAFCo staff has some concerns regarding the DEIR and General Plan policies regarding protection of agricultural land as detailed below.

01-1

### Section 3.2.1.1 and Exhibit 4.10-1

Since the City embarked on its General Plan process in 2013, Yolo LAFCo amended its local policies on January 28, 2016 to remove the 10-year and 20-year distinctions for spheres of influences. Therefore, the area is all considered simply sphere of influence now with no distinctions (you may want to amend the DEIR text and maps accordingly but don't necessarily need to).

01-2

Regarding the stated intent to request LAFCo amend the City's Sphere of Influence to include all the territory within the Urban Limit Line following adoption of the General Plan, upon review it may be difficult for LAFCo staff to recommend inclusion of those areas where your General Plan indicates that development is only permitted after 2036 and after another comprehensive General Plan Update is completed. This would include what's referred to as "Development Area SP-1B". I am also uncertain about the status of the "Flood Study Area" in the northwest corner along I-5 as it also appears to be a "holding" type of designation. In order for LAFCo to include these areas in the City's sphere of influence, our local policies require justification regarding demand for growth and housing need. It may be difficult to justify the need when development is not programmed for these areas in the 20-year planning horizon of the City's General Plan. We'll need to discuss this further prior to the City's next Municipal Service Review/Sphere of Influence Update.

01-3

### Agricultural Resources Mitigation Measure 4.2-3

Mitigation Measure 4.2-3 includes a significant caveat that effectively negates the effectiveness of the mitigation. The language of concern is underlined below:

01-4

CHAIR  
OLIN WOODS  
Public Member

VICE CHAIR  
MATT REXROAD  
Supervisor - 3<sup>rd</sup> District

CECILIA AGUIAR-CURRY  
Mayor  
City of Winters

DON SAYLOR  
Supervisor - 2<sup>nd</sup> District

WILL ARNOLD  
Councilmember  
City of Davis

ALTERNATES  
ROBERT RAMMING  
Public Member

JIM PROVENZA  
Supervisor - 4<sup>th</sup> District

ANGEL BARAJAS  
Councilmember  
City of Woodland

Staff  
CHRISTINE M. CRAWFORD, AICP  
Executive Officer

SARAH KIRCHGESSNER  
Management Analyst

TERRI TUCK  
Commission Clerk

ERIC MAY  
Commission Counsel

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**Mitigation Measure 4.2-3 – The 2035 General Plan should be amended to include the following new policy:**

***“Policy 7.C.5 Agricultural Buffer. Require new development that occurs at the edge of the ULL to be set back a minimum of 300 feet from adjacent agricultural land where possible. Exceptions and alternative means of providing agricultural buffers may be considered by the Planning Commission on a case by case basis for parcels where development potential would be precluded or severely limited as a result of the required buffer size. The buffer shall be landscaped/vegetated and may include public right of way.”***

The intent of the mitigation measure is to reduce development at the urban edges, so it’s inevitable that it would preclude or limit development potential. Allowing this rationale as a basis to grant a project exception from this mitigation measure is a massive loophole and an easy argument for any and every development project to make. The concern is that this caveat would completely undermine the effectiveness of the mitigation measure. Some reasonable flexibility may make sense but this language weakens the mitigation far too much. “Equivalent means” instead of “Exceptions and alternative means” is suggested. If this is truly the final urban edge, as approved by the Woodland voters, some land use “feathering” is appropriate as a transition to agricultural uses. Therefore, LAFCo strongly supports maintaining a 300-foot buffer, which is already less than the 500’ policy of the Yolo County Agricultural Commissioner, so that agricultural production is not compromised and to provide a lasting transition from urban development to agricultural uses.

01-4  
cont.

**Page 4.10-10**

The heading incorrectly refers to LAFCo as the Local Area Formation Commission. It should be “Agency”.

01-5

**Comments on the General Plan Agricultural Resource Policies**

LAFCo staff notes that there are no action items or implementation programs in Appendix A to implement General Plan Policies 7.C.1, 7.C.2, 7.C.3 and 7.C.4 (or 7.C.5 added by the DEIR) regarding agricultural resources. Especially Policy 7.C.4 regarding ensuring urban development is compatible with the economic vitality of adjacent agricultural practices and Policy 7.C.5 regarding implementation of a 300-foot buffer. As noted above, additional policy guidance is clearly needed to explain how these policies are meant to be implemented by City staff, Planning Commission and City Council.

01-6

Thank you again for consulting with Yolo LAFCo. If you have any questions, please feel free to contact me.

Best regards,

Christine M. Crawford, AICP

cc: LAFCo Commission  
John Young, Yolo County Agricultural Commissioner

## 2.4 RESPONSE TO COMMENT LETTER #01

**Comment 01-1** This comment provides an introduction to the comments that follow.

Response: No response is required.

**Comment 01-2** The commenter notes that Yolo LAFCo amended its policies on January 28, 2016 to remove distinctions between the 10-year and 20-year spheres of influence.

Response: Exhibit 3.2.2 and the figure legend on page 3-4 have been revised to reflect this change. Please see Chapter 3 of the Final EIR for a list of modifications to the Draft EIR.

**Comment 01-3** The commenter suggests that it may be difficult for LAFCo staff to recommend inclusion of those areas (i.e., SP-1B and Flood Study Area) where the General Plan indicates that development is not programmed before the horizon year of the 2035 General Plan. The commenter recommends the City discuss this issue with LAFCo prior to the City's next Municipal Service Review/Sphere of Influence Update.

Response: This comment does not raise issues regarding the adequacy of the EIR or environmental effects under CEQA. However, the City takes note of this comment and confirms that it is part of the record for consideration by decision makers. The City will coordinate with LAFCo in the future, as appropriate, on proposed SOI amendments and/or annexations. This EIR covers the full General Plan Planning Area/Urban Limit Line and addresses potential environmental effects associated with annexation within the Planning Area for the purposes of development consistent with the General Plan.

**Comment 01-4** The commenter expresses concern about the effectiveness of Mitigation Measure 4.2-3, as the Planning Commission could consider, on a case-by-case basis, exceptions and alternative means to provide agricultural buffers in cases where the development potential would be precluded or severely limited as a result of the required buffer. The commenter recommends using the words "Equivalent means" instead of "Exceptions and alternative means" in this mitigation measure.

Response: The text on page 4.2-42 has been revised to read:

~~"Exceptions and alternative means~~Equivalent means of providing agricultural buffers may be considered by the Planning Commission on a case by case basis for parcels where development potential would be precluded or severely limited as a result of the required buffer size."

**Comment 01-5** The commenter notes a mistake in the reference to LAFCo.

Response: The title in reference to LAFCo on page 4.10-10 has been revised to read as follows:

**“Local Area Agency Formation Commission 2011 City of Woodland Municipal Service Review”**

**Comment 01-6** The commenter notes that the following 2035 General Plan policies do not have correlating action items or implementation programs and recommends that the 2035 General Plan include more policy guidance. Referenced policies include:

- ▶ **Policy 7.C.1 Annexation.** Annex land to the City only as it is needed for development of designated growth areas. Annexation of agricultural land will not be permitted unless urban development consistent with the General Plan has been approved.
- ▶ **Policy 7.C.2 Agricultural Uses Within the ULL.** Where agriculture exists within the ULL, allow uses to continue until urban development (consistent with the General Plan) occurs on these properties.
- ▶ **Policy 7.C.3 Surrounding Agricultural Land.** Encourage Yolo County to conserve agricultural soils, preserve agricultural land surrounding the ULL, and promote the continuation of existing agricultural operations.
- ▶ **Policy 7.C.4 Compatibility.** Ensure that urban development within the ULL does not affect the economic viability of adjacent agricultural practices located outside the ULL.
- ▶ **Policy 7.C.5 Agricultural Buffer.** Require new development that occurs at the edge of the ULL to be set back a minimum of 300 feet from adjacent agricultural land where possible. Exceptions and alternative means of providing agricultural buffers may be considered by the Planning Commission on a case by case basis for parcels whose dimensions would preclude or severely limit development potential with the required buffer size. The buffer shall be landscaped and may include public right of way.

Response: This is a comment on the Draft General Plan, not the substance of the Draft EIR. Regardless, the City is confident that these policies provide sufficient direction for decision making. Should further direction in the form of implementation programs be necessary, such direction may be added as implementation programs in the future without the need for a General Plan Amendment.

## 2.5 COMMENT LETTER #02

State of California



The Natural Resources

02

### Memorandum

To: Megan Scheeline  
LNU

Date: 9/21/2016

From: Chris Browder, Deputy Chief Environmental Protection

Subject: Environmental Document Review  
Project Name: City of Woodland General Plan Update and Updated Climate Action Plan.  
SCH#: 2013032015  
Document Type: Notice of Preparation  
Potential Area(s) of Concern:  Fire Protection  Oak Woodland  Need of THP  
 Timberland Conversion  Reforestation  Other:  
**DUE DATE: 11/2/2016**

The above-referenced environmental document was submitted to CAL FIRE for review under the California Environmental Quality Act or the National Environmental Policy Act. The proposed project is located in the area associated with your unit. Project activities may affect CAL FIRE's fire protection operations or natural resources under the Department's jurisdiction, or both, or the project may require a permit from CAL FIRE. Please review the attached document and address your comments, if any, to the lead agency prior to the due date. Your input at this time may allow the project proponent to modify the project to reduce or avoid any identified significant effects or to obtain the appropriate permit prior to project implementation. If your unit's environmental coordinator is not available, please pass this on to another staff member in order to provide comments prior to the due date.

Comments should be submitted directly to the lead agency before the due date with a copy to the State Clearinghouse (P.O. Box 3044, Sacramento, CA 95812-3044). If you have no comments, please check the item below and provide a brief explanation.

No Comment - Explanation: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Name and Title of Reviewer: Megan Scheeline  
Phone: 707-967-1428 Email: Megan.Scheeline@fire.ca.gov  
Note: Please complete this form and return it with a copy of any comments to: Ken Nehoda or Chris Browder, P.O. Box 944246, Sacramento CA 94244-2460.

I consulted with staff at CAL FIRE's Land Use Planning Program, Office of the State Fire Marshall, and received the information below that I wish to pass on. I do not request a reply to these comments; this is for your information only.

02-1

Since the City of Woodland does not have any Very High Fire Hazard Severity Zones (VHFHSZs), they are not required by law to submit their Safety Element to the Board of Forestry. It would be beneficial for them to address the risk of wildfire as it relates to new development in their City, but not required. There are two good documents that they might benefit from looking at. One is Fire Hazard Planning ([https://www.opr.ca.gov/docs/Final\\_6.26.15.pdf](https://www.opr.ca.gov/docs/Final_6.26.15.pdf)) by the Office of Planning and Research (OPR), and the other is A Handbook for Fire Hazard Planning in the General Plan ([http://www.bof.fire.ca.gov/resources/fire\\_planning\\_and\\_the\\_general\\_plan\\_handbook\\_final\\_may\\_2014\\_newtitlepage.pdf](http://www.bof.fire.ca.gov/resources/fire_planning_and_the_general_plan_handbook_final_may_2014_newtitlepage.pdf)) by the Board of Forestry.

02-2

Megan Scheeline  
Megan Scheeline  
CAL-FIRE Sonoma-Lake-Napa Unit

## 2.6 RESPONSE TO COMMENT LETTER #02

**Comment 02-1** The commenter notes that she is providing information related to CAL FIRE's land use planning program and does not request a response.

Response: No response is required.

**Comment 02-2** The commenter clarifies that the City is not required to submit the Safety Element to the Board of Forestry for review but that the City may consider consulting two resource documents. The City takes note of this comment.

Response: No response is required. The City takes note of this comment.

## 2.7 COMMENT LETTER #03

**03**



1947 Galileo Ct., Suite 103 • Davis, California 95618

(530) 757-3650 • (800) 287-3650 • Fax (530) 757-3670

October 13, 2016

Ms. Cindy Norris  
City of Woodland  
Community Development Department  
300 First Street  
Woodland, CA 95695



Dear Ms. Norris:

The Yolo-Solano Air Quality Management District (District) received the Draft Environmental Impact Report for the City of Woodland's General Plan Update. The District has reviewed the document and has the following comments. 03-1

1. Page 16 of the Air Quality section of the EIR states that the District is finalizing the 2015 Triennial Plan Assessment and Update. The District Board of Directors adopted a final version of the Plan in July of 2016. This Plan Update covers the three-year period between 2012 and 2014. The Plan Update focuses on the District's progress towards attainment of the State ozone standard but does not examine particulate matter, consistent with the provisions of the California Clean Air Act. 03-2

2. The District's CEQA thresholds of significance for criteria pollutants and toxic air contaminants are referenced on page 20 of the Air Quality Impact Analysis. The District would like to point out that the 10 in 1 million excess cancer risk threshold for air toxics was adopted specifically for the evaluation of stationary source impacts. The District has not adopted a specific threshold of significance for toxic impacts from mobile sources. In the past, however, lead agencies have applied the 10 in one million stationary source threshold to mobile sources as well. The District believes that using the 10 in one million threshold can provide an accurate and conservative assessment of the significance of mobile source-related impacts from air toxics such as diesel particulate matter. 03-3

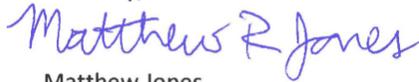
3. The District is in agreement that the mitigation measures described in measures 4.3-3a, 4.3-3b, 4.3-3c and 4.3-3d represent a comprehensive set of actions that will reduce sensitive receptor exposure to toxic air contaminants to the extent feasible. The District acknowledges that there are many reasons to promote and encourage mixed-use and infill development, and that this type of development has a higher likelihood of placing sensitive receptors in proximity to sources of toxics. However, the mitigation measures as described should help to ensure that these impacts are minimized as growth occurs in the City through 2035. 03-4

4. The conclusions in the EIR's Climate Change analysis rely in large part on the City's implementation of the goals included in Woodland's Climate Action Plan (CAP). These CAP goals describe actions that the City will take to meet certain greenhouse gas reduction targets in 2020 and 2035. The adoption of a Climate Action Plan that has gone through the environmental review process will potentially allow future projects to tier from the CAP's CEQA analysis. However, if the City intends to rely on the CAP and the EIR for tiering purposes under CEQA, the City would need to demonstrate that the goals in the CAP have been implemented and that the targets have been met for the appropriate analysis year. This will help to ensure the legal defensibility of future CEQA analyses for development projects in Woodland.

03-5

The District appreciates the opportunity to comment on the DEIR for this project. If you have any questions about the comments included in this letter, please feel free to contact me at 530-757-3668 or email me at [mjones@ysaqmd.org](mailto:mjones@ysaqmd.org).

Sincerely,



Matthew Jones

Planning Manager, YSAQMD

## 2.8 RESPONSE TO COMMENT LETTER #03

**Comment 03-1** This is an introductory comment only, which the City acknowledges.

Response: No response is required.

**Comment 03-2** The commenter recommends that the EIR be revised to reflect that the Triennial Plan Assessment was adopted in July 2016.

Response: The EIR on Page 16 of “Air Quality” has been revised to read as follows:

“The most current AQAP update was adopted in July 2016 ~~adopted in April 2013;~~ however, YSAQMD is currently in the process of finalizing the 2015 Triennial Assessment and Plan Update (YSAQMD 2016).”

**Comment 03-3** The commenter states that the thresholds of significance for air toxics was adopted for stationary sources, however the District believes that it is an accurate assessment for mobile sources, as well.

Response: The “Air Quality” section of the EIR has been revised on page 4.3-20 to include the following new footnote number 10 concerning TAC emissions:

<sup>10</sup> The YSAQMD notes that this threshold was adopted specifically for the evaluation of stationary source impacts and that it believes that this threshold can provide an accurate and conservative assessment of the significance of mobile source-related impacts from air toxics from mobile sources, such as diesel particulate matter. The YSAQMD also notes that no specific threshold of significance for toxic impacts has been adopted for mobile sources and that the 10 in one million threshold has been used by lead agencies for assessing mobile source impacts.

**Comment 03-4** The commenter agrees with the City’s conclusions concerning Mitigation Measures 4.3-3a through 4.3-3d.

Response: The City acknowledges the Air District’s concurrence.

**Comment 03-5** The commenter states that if the City intends to rely on the CAP and the EIR for tiering purposes, the City would need to demonstrate that the goals for greenhouse gas (GHG) emissions in the CAP have been implemented and the targets have been met.

Response: The City agrees with this comment and has included Mitigation Measure 4.5-1a, which creates an implementation program for the 2035 General Plan that relates to monitoring and updating the CAP over time to meet appropriate reduction targets. Please refer to pages 4.5-38 and 4.5-39 of the Draft EIR for details.

In addition, the CAP includes Chapter 5, “Implementation and Monitoring,” which addresses the City’s approach to CAP implementation, including tracking the performance of each

reduction measure and the need to evaluate, update, and amend the CAP over time, so the plan remains effective and current.

## 2.9 COMMENT LETTER #04

04

U.S. Department of Homeland Security  
FEMA Region IX  
1111 Broadway, Suite 1200  
Oakland, CA. 94607-4052



FEMA

October 5, 2016

Cindy Norris, Principal Planner  
Woodland CAP Comments @City of Woodland.org  
Woodland City Community Development Department  
300 First Street  
Woodland, California 95145



Dear Ms. Norris:

This is in response to your request for comments regarding the Notices of Availability for Draft 2035 Climate Action Plan and Draft Environmental Impact Report (DEIR) for the Draft 2045 General Plan Update and Draft 2035 Climate Action Plan for the City of Woodland.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Yolo (Community Number 060423) and City of Woodland (Community Number 060426), Maps revised May 16, 2012. Please note that the City of Woodland, Yolo County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any *development* must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

04-1

www.fema.gov

- All buildings constructed within a coastal high hazard area, (any of the “V” Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA’s Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

04-2

04-3

**Please Note:**

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community’s floodplain manager for more information on local floodplain management building requirements. The Woodland floodplain manager can be reached by calling Paul Siegel, Chief Building Official, at (530) 661-5850. The Yolo County floodplain manager can be reached by calling David Morrison, Assistant Director of Planning, at (530) 666-8041

04-4

If you have any questions or concerns, please do not hesitate to call Xing Liu of the Mitigation staff at (510) 627-7267.

Sincerely,



Gregor Blackburn, CFM, Branch Chief  
Floodplain Management and Insurance Branch

cc:

Paul Siegel, Chief Building Official, City of Woodland  
David Morrison, Assistant Director of Planning, Yolo County  
Ray Lee, WREA, State of California, Department of Water Resources, North Central Region  
Office  
Xing Liu, NFIP Planner, DHS/FEMA Region IX  
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

[www.fema.gov](http://www.fema.gov)

## 2.10 RESPONSE TO COMMENT LETTER #04

**Comment 04-1** The commenter describes the NFIP floodplain management building requirements.

Response: The Draft EIR also includes relevant regulatory background information. This comment is noted.

**Comment 04-2** The commenter describes the NFIP floodplain management building requirements.

Response: The Draft EIR also includes relevant regulatory background information. This comment is noted.

**Comment 04-3** The commenter describes the NFIP floodplain management building requirements.

Response: The Draft EIR also includes relevant regulatory background information. This comment is noted.

**Comment 04-4** The commenter offers contact information for local and County floodplain managers.

Response: The City acknowledges receipt of this contact information.

## 2.11 COMMENT LETTER #05

05

**City Staff Notes Summarizing  
Oral Comments Made During  
October 20, 2016 Planning Commission Hearing  
Approved at December 15, 2016 Planning Commission Hearing**

### PRESENT

Planning Commission Members: K. Wells, S. Harris, M. Lizarraga, C. Holt, J. Murphy, E.Ortega-Lampkin, F. Lopez  
Staff and Consultants: Ken Hiatt, Cindy Norris, Roberta Childers, Heidi Tschudin

### Draft EIR Comments (Legistar 16-781)

#### Commissioner Questions

**Commissioner John Murphy:** When the environmentally superior method is chosen, in that case we do not consider the no project alternative right?

**Response, Heidi Tschudin:** When the environmentally superior project is the no project then the next environmentally superior project is considered environmentally superior. That alternative was the south alternative.

05-1

**Commissioner Chris Holt:** Is the council still choosing which general plan the city will move forward with?

**Response, Ken Hiatt:** Yes, the council will choose which plan or a combination of two.

05-2

**Commissioner Chris Holt:** How does the streamlining process work if a developer wants to develop a different mix of properties or more properties in the east or south alternative? What if they want to change that balance?

**Response, Heidi Tschudin:** When a project is consistent with general plan it can rely on general plan EIR itself and climate action plan to move forward. The extent of streamlining depends on the project.

05-3

**Commissioner Chris Holt:** What is the process if we go with one alternative and 5 years later the other one comes back and says "We want to go", the others are not moving?

**Response, Heidi Tschudin:** The general plan is not a static document which is why we have a generous amount of general plan amendments. If an opportunity wishes to explore an opportunity you can have a general plan amendment. If a dramatic change happens in a few years, a large amendment can take place.



**Response, Ken Hiatt:** We would evaluate the amendment and do an additional project EIR.

05-3  
cont.

**Commissioner Chris Holt:** As we decide whether to go south or east does the EIR get stripped of irrelevant information?

05-4

**Response, Ken Hiatt:** The EIR is static.

**Commissioner Chris Holt:** If we go with south but in a few years we go with east, will east be able to use the EIR?

**Response, Ken Hiatt:** Yes, we will know that we have got some initial analysis.

05-5

**Commissioner Marco Lizarraga:** We have done this before, where we phased and promised amendments for projects before so the answer is in our history already.

## **Public Comments**

### **CHRISTINE SHEWMAKER**

- She is interested in climate change and sustainability. She is also concerned that the No-Project Alternative is stated as worse for the CAP. Slower growth should not be bad. (Table 5-24)
- Surprised by the closeness of the air quality impacts for the two alternatives (Chapter 4-3 and 4-5). In the east construction of the new interchange and new flood work should be considered in the construction impacts analysis. In the east alternative, construction impacts must be considered.
- Table 4-2-8 comparing Ag acres for SP-A1 looks incorrect.

05-6

05-7

05-8

### **EVELIA GENERA**

- Focused her comments on hydrology, water quality and flooding review.
- Pg 4.9-23 AB 162- amend land use to address flood related matters. Make sure we are consistent for government, regional (county), and local code. Limit development in flood prone areas. There are huge implications in accepting a plan that develops into 100-year flood zone, especially for a land owner who pays flood protection insurance.
- 4.9-25 to 27 county policies. No development in deep flood (Policy 8.B.3)

05-9

05-10

## **Commissioner Comments**

### **COMMISSIONER CHRIS HOLT**

- Quite a document, very long but very well written. Concerned with the equal weight analysis of East and South. It is dangerous for us to go so low for the east.
- Concern about the low development assumption for SP-2

05-11

- Would like the EIR to show realistically that if they go east, that growth could exceed 7,000 dwelling units. It was the will of the community to cap it at 7,000 units but east would likely exceed that. 14,000 is more realistic and would still keep us below neighboring communities.
- He listed growth numbers for other communities between 2000 and 2010
  - Davis 60,308 – 65,322 – 8.8%
  - Folsom – 7100+ units 39%
  - Rocklin – 7,470+ units, 56%
  - Roseville – 14,000 units, 49%
  - Elk Grove (33,000 units)

05-12

**COMMISSIONER MARCO LIZARRAGA**

- Development will be based on current market and resources. Numbers from other communities are irrelevant. We cannot compare ourselves to Folsom. We thought spring lake would explode and it did not. He is not fearful of explosive growth.

05-13

**COMMISSIONER JOHN MURPHY**

- Everything is within our control. Commissioner Holt's comment has merit. East assumes 25% of the area developed. 25% may not be enough to support the necessary infrastructure costs.

05-14

**COMMISSIONER CHRIS HOLT**

- Yes, it is very readable. When you look at the east alternative and remove the 7000-unit cap, the GHG difference between the two alternatives goes up very quickly. Despite our best efforts to get complete neighborhoods developed and a second town center, it may not happen. If it does not happen these numbers get even more disparate. We are not over

05-15

reacting. The elements laid out of the table for us to make these decisions make a huge difference.

05-15  
cont.

## 2.12 RESPONSE TO COMMENT LETTER #05

**Comment 05-1** The commenter asks about the relationship between the environmentally superior alternative and the No Project alternative.

Response: When the environmentally superior alternative is the “No Project Alternative” then CEQA provides that the EIR must identify the next environmentally superior alternative. For the City of Woodland General Plan EIR, the environmentally superior alternative is the South Alternative. Please refer to Chapter 5 of the Draft EIR for details regarding the alternatives and alternatives analysis.

**Comment 05-2** The commenter is asking whether or not the process of developing the General Plan is still occurring.

Response: This comment is related to the Project, but not the adequacy of the Draft EIR in assessing the potential environmental effects associated with the Proposed Project. The City takes note of the comments.

**Comment 05-3** The commenter asks about the process for evaluating later projects if they are different from the adopted General Plan.

Response: These comments are not related to the adequacy of the Draft EIR for analyzing environmental impacts associated with the Proposed Project. Later projects that differ from the General Plan would require a General Plan Amendment and CEQA evaluation to proceed. See also response to comment 05-5 below.

**Comment 05-4** The commenter asks, if the Commission directs the General Plan to the south or east, whether this would affect the relevance of information presented in the Draft EIR.

Response: The General Plan EIR includes a comprehensive analysis of both of the referenced alternatives. The Draft EIR will not be modified to remove the environmental analysis for the alternative that was not selected. However, the Draft General Plan will be modified to reflect the final decision by Council.

**Comment 05-5** The commenter asks if the City chooses the South Alternative, but in a few years decides to proceed instead with the East Alternative or projects contemplated in the East Alternative, whether the EIR will remain applicable.

Response: The Draft EIR comprehensively analyzes both the East and South Alternatives. If the scenario described by the commenter were to occur, it is likely that there would be useful information in the Draft EIR that could be tiered from or used in a supplemental, subsequent, or other type of new or revised environmental analysis.

**Comment 05-6** The commenter is concerned that the No Project Alternative is stated as being worse in relation to the CAP component than either of the growth alternatives. The commenter refers to Table 5-24 of the Draft EIR, which is a summary comparison of the relative environmental

effects associated with the No Project Alternative, the East Alternative, and the South Alternative.

Response: The Draft EIR discloses analysis of the alternatives both with respect to the total emissions and also the emissions per capita and per employee. As described in detail in Chapter 5 of the Draft EIR (see pages 5-36 through 5-40), the No Project Alternative would result in fewer total greenhouse gas (GHG) emissions as compared to the East Alternative and South Alternative. The 2035 CAP, which applies to the East and South Alternatives, would ensure that GHG emission rates within Woodland are consistent with those necessary statewide to achieve the State's own goals. As noted in Chapter 5, with policies in the 2035 General Plan and reduction strategies included in the 2035 CAP, the East and South Alternatives would be efficient enough to provide Woodland's fair share of the State's overall GHG emission reduction goals. The State of California has approved GHG emission reduction targets that apply to the State government (including AB 32, Executive Order B-30-15, SB 32, and Executive Order S-3-05), and Woodland's 2035 CAP demonstrates that the rate of GHG emissions with implementation of the 2035 General Plan and 2035 CAP would be consistent with the State's targets. While the No Project Alternative would demonstrate consistency with State emission reduction legislation for 2020, proceeding with the No Project Alternative would not allow the City to demonstrate consistency with the longer-term State goals for 2030 and 2050.

**Comment 05-7** The commenter inquired regarding the similarities of the air quality impacts for the two alternatives (Chapter 4-3 and 4-5) and recommends that in the East Alternative, construction of the new interchange and new flood work should be considered in the construction impacts analysis.

Response: The environmental analysis examines overall implementation of each alternative, including acreage developed, land use types, and the amount of land use change. This includes forecast land use change through 2035 for the East Alternative and South Alternative throughout Chapter 4 and Chapter 5 of the EIR, as well as analysis of buildout of the City's Planning Area in Chapter 6 of the Draft EIR. The operational air quality and greenhouse gas (GHG) emissions analysis takes into account the vehicle miles traveled (VMT) associated with each alternative, including travel along both existing and new transportation facilities (including interchanges). Individual projects that could be developed within the Planning Area were not specifically included in the analysis due to the uncertainty of specific projects and the lack of details regarding design and timing. However, the EIR does analyze the overall construction and operational emissions of the Proposed Project at a programmatic level, using a methodology that is appropriate for a General Plan. Consistent with guidance from the Yolo-Solano Air Quality Management District (YSAQMD), the Draft EIR "ensures consideration of the cumulative impacts of the entire project, as opposed to the case-by-case analysis of the project's individual components" (YSAQMD 2007, page 24). Within the environmental analysis for construction-related emissions, the City included conservative assumptions to account for the fact that the timing and details associated with future projects is unknown. As described on page 4.3-18 of the Draft EIR, the City assumed that 25 percent of the total land uses could be constructed in a single year. This is unlikely, and therefore the

Draft EIR likely overestimated potential construction-related effects. Also, the Draft EIR assumed that development would be constructed in the earliest possible construction year (2017). This assumption also provides a conservative estimate of the proposed project’s construction-related emissions because emission factors for construction equipment and vehicles decrease over time due to turnover in vehicle and equipment fleets, advancements in emission technology, and increasingly stringent emissions standards. Because the overall development assumptions for both alternatives are similar, the maximum annual construction-related emissions associated with each alternative is also similar. Please see Section 4.3 of the Draft EIR, and in particular, pages 4.3-21 through 4.3-25 for details.

**Comment 05-8** The commenter asked whether Table 4-2-8 comparing acres of agricultural land for SP-1 is correct.

Response: Table 4-2-8 on page 4.2-29 of the Draft EIR contains errors and has been revised as shown below:

<b>Table 4.2-8. Acres of Each Type of Farmland in SP-1, SP-2, and SP-3</b>				
Type	SP-1	SP-2	SP-3	
Prime Farmland	<del>134.57</del> <u>0.3</u>	0.0	213.29	
Farmland of Statewide Importance	0.0	374.9	0.0	
Unique Farmland	0.0	393.5	0.0	
<i>Total Important Farmland</i>	<del>134.57</del> <u>0.3</u>	<i>768.4</i>	<i>213.29</i>	
Other Farmland	<del>0.0</del> <u>31.3</u>	66.43	59.13	
Sources: Farmland Mapping and Monitoring Program 2012; City of Woodland 2013; Yolo County 2013; SACOG Mapping Center 2014; Dyett & Bhatia 2013				

Table 4.2-8 shows the total amount of Important Farmland in SP-1, SP-2, and SP-3, as shown in Exhibit 4.2-1 in Section 4.2, Agricultural Resources, of the Draft EIR. Tables 4.2-10 and 4.2-11 in the same section show the expected amount of farmland conversion from the implementation of the East and South Alternatives, respectively. Tables 4.2-10 and 4.2-11 show impacts to all farmland in the Planning Area that is expected to convert, including farmland in SP-1, SP-2, and SP-3, as well as farmland outside of those areas.

For further clarification, Table Comment 05-8a, below, shows the existing, projected change in, and remaining amount of farmland from implementation of the East Alternative in SP-1, SP-2, and SP-3, as well as remaining areas of the Planning Area. Table Comment 05-8b shows the same for the South Alternative. For the East Alternative, it is assumed that all farmland in SP-1A, the Southern Gateway portion of SP-1B, approximately 25 percent of SP-2 (as shown in Exhibit 4.2-7), SP-3, and all farmland in remaining areas of the Planning Area will convert. For the South Alternative, it is assumed that farmland in SP-1, SP-3, and all farmland in remaining areas will convert.

<b>Table Comment 05-8a. Existing and Projected Change in Important Farmland Acreage - East Alternative</b>				
		Existing Acres	Change (Acres Converted)	Remaining Farmland Acres at General Plan Horizon Year (2035)
<b>SP-1</b>	<b>Prime Farmland</b>	700.3	494.4	205.9
	<b>Farmland of Statewide Importance</b>	0.0	0.0	0.0
	<b>Unique Farmland</b>	0.0	0.0	0.0
	<b>Total Important Farmland</b>	700.3	494.4	205.9
<b>SP-2</b>	<b>Prime Farmland</b>	0.0	0.0	0.0
	<b>Farmland of Statewide Importance</b>	374.9	11.5	363.4
	<b>Unique Farmland</b>	393.5	124.3	269.2
	<b>Total Important Farmland</b>	768.4	135.8	632.5
<b>SP-3</b>	<b>Prime Farmland</b>	213.3	213.3	0.0
	<b>Farmland of Statewide Importance</b>	0.0	0.0	0.0
	<b>Unique Farmland</b>	0.0	0.0	0.0
	<b>Total Important Farmland</b>	213.3	213.3	0.0
<b>Outside Specific Plan Areas<sup>1</sup></b>	<b>Prime Farmland</b>	631.1	631.1	0.0
	<b>Farmland of Statewide Importance</b>	26.2	26.2	0.0
	<b>Unique Farmland</b>	41.4	41.4	0.0
	<b>Total Important Farmland</b>	698.7	698.7	0.0
<b>TOTAL</b>	<b>Prime Farmland</b>	<b>1,544.7</b>	<b>1,338.7</b>	<b>205.9</b>
	<b>Farmland of Statewide Importance</b>	<b>401.1</b>	<b>37.7</b>	<b>363.4</b>
	<b>Unique Farmland</b>	<b>434.9</b>	<b>165.7</b>	<b>250.6</b>
	<b>Total Important Farmland</b>	<b>2,380.7</b>	<b>1,542.2</b>	<b>838.5</b>
Notes:				
1. This includes all farmland outside of SP-1, SP-2, and SP-3, including areas in the Flood Study Area. As shown in Exhibit 4.2-1, this includes farmland north and east of SP-1, north of SP-2, north of SP-3, and east of County Road 102.				

<b>Table Comment 05-8b. Existing and Projected Change in Important Farmland Acreage - South Alternative</b>				
		Existing Acres	Change (Acres Converted)	Remaining Farmland Acres at General Plan Horizon Year (2035)
<b>SP-1</b>	<b>Prime Farmland Farmland of Statewide Importance</b>	700.3	700.3	0.0
	<b>Unique Farmland</b>	0.0	0.0	0.0
	<b>Total Important Farmland</b>	700.3	700.3	0.0
	<b>Prime Farmland Farmland of Statewide Importance</b>	0.0	0.0	0.0
<b>SP-2</b>	<b>Unique Farmland</b>	374.9	0.0	374.9
	<b>Total Important Farmland</b>	393.5	0.0	393.5
	<b>Prime Farmland Farmland of Statewide Importance</b>	768.4	0.0	768.4
	<b>Unique Farmland</b>	213.3	213.3	0.0
<b>SP-3</b>	<b>Total Important Farmland</b>	0.0	0.0	0.0
	<b>Prime Farmland Farmland of Statewide Importance</b>	0.0	0.0	0.0
	<b>Unique Farmland</b>	0.0	0.0	0.0
	<b>Total Important Farmland</b>	213.3	213.3	0.0
<b>Outside Specific Plan Areas<sup>1</sup></b>	<b>Prime Farmland Farmland of Statewide Importance</b>	631.1	631.1	0.0
	<b>Unique Farmland</b>	26.2	26.2	0.0
	<b>Total Important Farmland</b>	41.4	41.4	0.0
	<b>Prime Farmland Farmland of Statewide Importance</b>	698.7	698.7	0.0
<b>TOTAL</b>	<b>Unique Farmland</b>	<b>1,544.6</b>	<b>1,544.6</b>	<b>0.0</b>
	<b>Total Important Farmland</b>	<b>401.1</b>	<b>26.2</b>	<b>374.9</b>
	<b>Prime Farmland Farmland of Statewide Importance</b>	<b>434.9</b>	<b>41.4</b>	<b>393.5</b>
	<b>Total Important Farmland</b>	<b>2,380.6</b>	<b>1,612.3</b>	<b>768.4</b>

Note:  
1. This includes all farmland outside of SP-1, SP-2, and SP-3, including areas in the Flood Study Area. As shown in Exhibit 4.2-1, this includes farmland north and east of SP-1, north of SP-2, north of SP-3, and east of County Road 102.

**Comment 05-9** The commenter references AB 162, which is discussed in the “Regulatory Framework” subsection of Section 4.9 of the Draft EIR, “Hydrology, Flooding, and Water Quality” and also suggests that development in flood zones should be limited. The commenter also requests consistency between the City and the County regarding flood matters.

Response: AB 162 requires cities and counties to amend the land use, conservation, safety, and housing elements of their general plans to address flood-related matters. These requirements have been incorporated into the City’s General Plan Update. Section 4.9 of the Draft EIR comprehensively addresses flood risk related to the Proposed Project.

Regarding consistency between the City in flood matters, the City and County are both subject to federal and State regulations related to development in flood-prone areas. As summarized in the “Regulatory Framework” subsection of Section 4.9 of the Draft EIR, existing laws and regulations reduce the potential environmental impact, including at the federal level (FEMA and Executive Order 11988) and at the State level (2007 Flood

Legislation, Central Valley Flood Protection Plan, and California Department of Water Resources regulations). County policies and regulations are described on pages 4.9-25 and 4.9-26 of the Draft EIR, existing City policies and regulations are described on pages 4.9-28 through 4.9-31 of the Draft EIR and proposed City policies are described on pages 4.9-55 through 4.9-57 of the Draft EIR.

**Comment 05-10** The commenter notes the Yolo County Policies on page 4.9-25 to 4.9-27 of the EIR. The commenter also brings attention to Policy 8.B.3 in the General Plan, which spells out flood management requirements of flood hazard zones.

Response: Please also see response to comment 05-9. Pursuant to State and federal law, the County and City both regulate development on land within their jurisdiction that is subject to flooding. In addition, each jurisdiction has local flood control policies and regulations that would apply to land within each jurisdiction. As noted above, the County's policies and regulations are summarized on pages 4.9-25 and 4.9-26 of the Draft EIR, existing City policies and regulations are summarized on pages 4.9-28 through 4.9-31 of the Draft EIR, and proposed City policies are summarized on pages 4.9-55 through 4.9-57 of the Draft EIR.

**Comment 05-11** The commenter expresses concern related to the equal weight alternatives analysis included in the Draft EIR and the development assumptions for SP-2.

Response: This comment is not related to the adequacy of the Draft EIR for addressing environmental effects associated with the Proposed Project, including both alternatives included in the analysis.

**Comment 05-12** The commenter would like the EIR to show that if the City builds to the east, that growth could exceed 7,000 dwelling units. The commenter notes that it was the will of the community to cap it at 7,000 units but building in the east of the City would likely exceed that and that 14,000 units is more realistic and would still keep the City below neighboring communities. As an example, the commenter listed growth numbers for other communities between 2000 and 2010.

Response: The General Plan Update anticipates the development of up to 7,000 new residential units through 2035. Therefore, the EIR analyzes the Project Alternatives using this assumption. An increase in housing beyond the projected 7,000 units proposed as part of the 2035 General Plan would be subject to additional CEQA review.

**Comment 05-13** The commenter notes that market conditions will influence development under the General Plan and that different communities have different development and planning conditions.

Response: This comment is not related to the adequacy of the Draft EIR for addressing environmental effects associated with the Proposed Project.

**Comment 05-14** The commenter discusses elements related to future policy actions and shares an observation related to future infrastructure costs.

Response: This comment is not related to the adequacy of the Draft EIR for addressing

environmental effects associated with the Proposed Project.

**Comment 05-15** The commenter notes that removing the 7,000-unit cap from the East Alternative results in a substantial increase in the GHG emissions in comparison with the South Alternative. The commenter further comments that the City may not get complete neighborhoods and a town center, and that if this happens, the difference in GHG emissions between the Project Alternatives may be greater.

Response: Although this comment was in the section of the hearing dealing with the Climate Action Plan and not the Draft EIR, it has been included here for informational purposes. The GHG emissions analysis presented in the Draft EIR is based on the Project Alternatives described in Chapter 2 of the Draft EIR, "Project Description." Please see also the response to comment 03-05.

## 2.13 COMMENT LETTER #06

06

Comments on Woodland Draft EIR released 9/19/16

DEIR covers General Plan Update (2035) and Climate Action Plan (2035)

C.K. Shewmaker

October 23, 2016

### 1. Use of Preliminary CAP 2020 in the No-Project analysis

You use the Preliminary CAP for your analysis of the No-Project alternative and the ultimate summary comparisons in Table 5-24. On page 5-8 it states that the “no project alternative must consider what is reasonably expected to occur in the foreseeable future” if the proposed project does not go forward.

For a variety of reasons it is not reasonable to assume Woodland would/could stay with the Preliminary CAP. First, with AB32, SB32 and a number of executive orders including EX3-3-05, we cannot assume that we can just go on to 2035 with the goal of 15% below 2005 ( the 2020 goal). On page 5-40 you do say the Preliminary CAP does not meet goals of 2030 and beyond. Even if the state would let us it would put the city at a disadvantage for grants, etc. You do acknowledge on page 38 the importance of state funding via grants etc. in meeting local GHG reduction goals.

Second, as written, the Preliminary CAP has some things that are incorrect and had to be changed for the 2020 portion of the new 2035 CAP. One change is the inclusion of solid-waste in Woodland’s GHG emissions total, not Yolo County’s. More importantly due to changes in PV efficiencies estimates, they needed to increase the MW in the renewable energy goal.

The use of the Preliminary Climate Plan in the no-project alternative leads to the conclusion that the No-Project Alternative is worse than either South or East for climate and greenhouse gas emissions (Table 5-24). To me that just seems wrong. If the 2035 draft CAP with a goal of 2.25 MT CO2e/sp is used, the No-Project Alternative (at 5400 new residences) is better than either the East or South (at 7000 new residences) for climate.

It is important that the community and especially the policy makers know that slow growth is not worse for the climate or the planet.

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*Typo alert* – On the bottom of page 5-62 the symbols for less overall and more overall impact are the same – one should be changed.

### 2. Calculation of Construction and Long-Term Air Quality ( 4.3) and Climate ( 4.5) Effects

The calculation of the air quality impacts for both construction (Table 4.3.6) and long-term operation (Table 4.3-7) yield numbers that are very close, but slightly better for South. The same is true for Climate (GHG) effects for both construction (Table 4.5-6) and long-term operation (Table 4.5-7).

06-1

06-2

06-3

06-4

06-5

There are two items I want to make sure are included in the East calculations. The first is the interchange that is needed on I-5 for the East alternative. It seems to me this would contribute more both to air quality impacts as well as GHG but I note in Table 4.5-6 that items such as asphalt paving and grading are the same between the East and South. On page 4-3-26 it refers the reader to Appendix D for the details, but I do admit I cannot tell for sure if the interchange construction is included in these tables. Please do confirm you included an interchange construction in the East alternative but not the South for determining Air Quality and Climate impacts.

06-5  
cont.

The second item that I want to make sure is included in the East calculations is construction of any flood solution. This is required for development to the East but not for the South. Again in Table 4.5-6 the items such as trenching, grading, and site preparation are exactly the same. If we build a flood solution, I think those numbers would be different between East and South. Again please do confirm the construction of a flood solution is included in the East calculations for Air Quality and Climate.

06-6

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*(Typo alert – on page 4-3-26 and in Table 4.3-7 it does say Appendix D – actually it should say Appendix C – Appendix D is actually cultural resources).*

06-7

### 3. Methane Calculations

Below is a repeat of what was in the comments on the Draft CAP, repeating here to make sure they are read by the DEIR team

The number you use for global warming potential (GWP) of methane varies between the CAP and the DEIR. In the CAP on page 3-1 you list it as 25, however on page 4.5-2 in the DEIR you say 28. In general it seems to me that researchers are moving towards the higher numbers. While in one spot the EPA says methane is more than 25 times greater than CO2

<https://www.epa.gov/ghgemissions/overview-greenhouse-gases#methane> in another spot the EPA says 28 to 36 <https://www.epa.gov/ghgemissions/understanding-global-warming-potentials> The IPCC now says 34 <https://cleantechnica.com/2013/10/04/ipcc-warns-methane-traps-much-heat-thought/> My feeling is the higher numbers are likely correct and I would like you to use 34 in your calculations, however, whichever you use, do be consistent between the DEIR and the CAP.

06-8

### 4. Tomato Emissions

In chapter 4-5 on page 4 you say that solid waste is now included in Woodland’s GHG emission tally because the practice is now for a municipality to count waste that is generated on location. I want to make sure and ask you state in the EIR that you are making the same assumption for the tomato waste (wastewater reuse). On page 21 you include it in both East and South at the same level even though for East it needs to be moved to some other site (within the city or out of the city). Also you list no strategies for mitigation – which would probably be quite expensive at the moment. So please add that you are making the assumption the tomato waste emissions stay with the city of Woodland.

06-9

Also some place in this chapter please identify the wastewater reuse as tomato. On page 26 in chapter 4-5 you say that the tomato waste from PCP must be relocated in the East alternative. However when you are dealing with wastewater reuse you do not identify it as coming from tomato. 06-10

**5. ZNE ( Zero Net Energy) – Include from the beginning**

In chapter 4.5 on page 27 you list strategies from the CAP (E-1 through E-6) that would lower GHG emissions in new construction. You list these again on page 52. I think it would be easier and more efficacious if you just go for ZNE now. You could say we will strive for it starting in 2017 while aiming to have it fully implemented by 2020. 06-11

**6. Table 4.2-8**

There may be an error on Table 4-2-8 which lists the various types of farmland in SP-1, SP-2 and SP-3. It shows only 134 acres for prime and total farmland in SP-1. While most of SP-1 is prime farmland I thought the total in SP-1 was much more than that. On page LU-2-61 in the draft GPU it says SP-1A is 347 acres, SP-1B is 248 acres and SP-1C is 151 acres. So please do check. 06-12

## 2.14 RESPONSE TO COMMENT LETTER #06

**Comment 06-1** The commenter states that it is not reasonable to assume that Woodland would or could stay with the Preliminary (2020) CAP under the “No Project Alternative” due to State laws that do not permit the less ambitious greenhouse gas goals in the Preliminary CAP.

Response: As noted on page 5-20 of the “Alternatives” Chapter of the Draft EIR, implementation of the Preliminary CAP is a part of the No Project Alternative, as is implementation of the 2002 General Plan (in addition to any amendments that occurred prior to the initiation of the General Plan Update). The alternative assumes that the City would continue implementation of the Preliminary CAP and implementation of applicable statewide requirements. In addition, the City notes that there is no State mandate for a climate action plan and no State mandate to prepare a climate action plan focused on any particular planning horizon.

**Comment 06-2** The commenter contends that another reason why the 2020 Preliminary CAP should not be considered a part of the No Project Alternative is because it had to be corrected to include solid waste in Woodland GHG emissions total, not Yolo County’s, and that the MW in the renewable energy should be increased. The commenter also states that “due to changes in PV efficiencies estimates,” the renewable energy goals in the 2035 Draft CAP were changed.

Response: The commenter correctly notes that several revisions were made to technical work from the Preliminary CAP (that addresses 2020) to create the Draft CAP, which addresses a 2035 planning horizon and reduction target. Solid waste emissions were previously excluded from the Preliminary CAP and were added to the Draft 2035 CAP in order to more accurately reflect best practices in preparing community GHG inventories. However, and as explained above, the State does not require drafting of a CAP, and the fact that the 2020 Preliminary CAP may contain older methodology or reflect different practices does not mean that it is unreasonable to assume continued implementation of it for the No Project Alternative. The Draft 2035 CAP calculated the community’s solid waste emissions based on the methane commitment method described in the Global Protocol for Community-scale Greenhouse Gas Emission Inventories (GPC). In order to maintain consistency across all CAP inventory and forecast years, solid waste emissions were estimated for the 2005 baseline year, as well as the 2020 and 2035 forecast years. See 2035 Draft CAP Appendix C, 2035 Forecasts and Target Methodology for further description of the solid waste emissions inputs and calculation methodology.

The statement regarding PV efficiencies is partially correct. The Draft 2035 CAP also recalculated the GHG reduction potential from Strategy E-6, Renewable Energy Generation and Procurement. The original calculation resulted in double counting the reduction potential from Strategy E-6 and the reductions assumed in the 2020 GHG forecasts from implementation of the Renewables Portfolio Standard (RPS). The GHG reduction calculations for Strategy E-6 in the Draft 2035 CAP were performed using a “bottom-up” calculation of the electricity generation potential of solar PV systems in Woodland based on outputs from the National Renewable Energy Laboratory. The total electricity general

potential was then multiplied by a business-as-usual electricity emissions factor that assumes the RPS is not implemented. Reductions related to implementation of the RPS were then calculated separately in the adjusted business-as-usual emissions forecast scenario to avoid double counting reductions from Strategy E-6. Further, in order to maintain the same amount of GHG reductions previously envisioned in the Preliminary CAP, the total amount of PV installations was revised upward to offset the lower reduction potential of each PV system based on the new consideration of double counting with the RPS reductions. As a result, the goals for solar PV installations in the community are higher in the 2035 Draft CAP than previously shown in the Preliminary CAP. The 2035 Draft CAP now also includes policy direction on what should happen if these new solar PV installation targets are not met or the City finds during CAP monitoring that installations are not on-track to achieve the targets by 2020 and 2035. See 2035 Draft CAP Appendix D, 2035 CAP Strategy Metrics for a description of the GHG reduction calculation methodology for Strategy E-6.

**Comment 06-3** The commenter contends that using the Preliminary CAP as part of the No Project Alternative leads to the conclusion that the No Project Alternative is environmentally worse than either the South or East Alternative. The commenter further contends that if the 2035 Draft CAP with a goal of 2.25 metric tons of carbon dioxide equivalent per service population (MT CO<sub>2</sub>e/SP) is used, the No Project Alternative (at 5,400 new residences) is better than either the East or South (at 7,000 new residences) for the climate.

Response: Comparing the Preliminary 2020 CAP to the proposed revised 2035 CAP, the latter is a better, more complete, more up-to-date, more forward reaching plan – this supports a conclusion that it is an environmentally superior CAP compared to the current one. This is a separate issue from the growth encompassed in each CAP, which is the commenter’s point and which is acknowledged in the analysis where it is demonstrated that lower overall emissions under the No Project Alternative as compared to the East and South Alternatives. The Draft EIR discloses analysis of the alternatives both with respect to the total emissions and also the emissions per capita and per employee. As described in detail in Chapter 5 of the Draft EIR (see pages 5-36 through 5-40), the No Project Alternative would result in fewer total GHG emissions as compared to the East Alternative and South Alternative. The 2035 CAP, however, which applies to the East and South Alternatives, would ensure that GHG emission rates within Woodland are consistent with those necessary statewide to the State’s own goals. With policies in the 2035 General Plan and reduction strategies included in the 2035 CAP, the East and South Alternatives would be efficient enough to provide Woodland’s fair share of the State’s overall GHG emission reduction goals. The State of California has approved GHG emission reduction targets that apply to the State government (including AB 32, Executive Order B-30-15, SB 32, and Executive Order S-3-05), and Woodland’s 2035 CAP demonstrates that the rate of GHG emissions with implementation of the 2035 General Plan and 2035 CAP would be consistent with the State’s targets. While the No Project Alternative would demonstrate consistency with State emission reduction legislation for 2020, implementation of the Preliminary CAP would not allow the City to demonstrate consistency with the longer-term State goals for 2030 and 2050.

**Comment 06-4** The commenter points out a typo.

Response: The last sentence on Page 5-62 of “Alternatives” has been changed to use this symbol “>,” when referring to a greater overall impact.

**Comment 06-5** The commenter states that air quality and climate impacts are similar for the South and East Alternatives. The commenter states that the I-5 interchange should be noted for the East Alternative but not for the South Alternative.

Response: Please see the response to comment 05-07.

**Comment 06-6** The commenter states that the East calculations should include a flood solution.

Response: Please see the response to comment 05-7.

**Comment 06-7** The commenter notes that references to the air quality modeling appendix is Appendix C, not D.

Response: The requested change has been made.

**Comment 06-8** The commenter notes a discrepancy between the global warming potential of methane in the CAP and Draft EIR.

Response: The reference to global warming potential (GWP) values in the CAP has been updated on page 3-1 to reflect a methane GWP value of 28, per the Intergovernmental Panel on Climate Change (IPCC) 5<sup>th</sup> Assessment Report (AR5). This report represents the current industry standard for GWP values used in international GHG inventories. While GWP values are revised with some regularity (for example, through revisions to the IPCC Assessment Reports), the CAP analysis represents a snapshot in time based on the most current information available at its time of preparation. With this change, the CAP and Draft EIR are consistent.

**Comment 06-9** The commenter correctly notes that for purposes of the 2035 CAP analysis, emissions associated with the agricultural reuse of wastewater are assumed to continue in the community through the 2035 time horizon.

Response: The 2035 GHG analysis does not attempt to estimate the future location of wastewater reuse within the community. The 2035 GHG forecasts from this source are based on a scenario in which the rate of emissions generation per unit of activity (e.g., population, employment, service population) remains constant. In particular, the wastewater reuse emissions for 2035 were calculated based on the same equation used to estimate that sector’s emissions in 2020.

If in the future, there was no agricultural reuse of wastewater, the City may wish to update this portion of the GHG inventory. However, the City currently has no evidence that would suggest agricultural wastewater reuse would cease. Alternative assumptions regarding this issue would be speculative at this time. For the purposes of the analysis, the GHG emissions associated with the tomato cannery effluent are retained as part of the City’s emissions inventory. This would present a conservative analysis of GHG emissions if this practice were

to cease in the future.

Even if this practice were to cease, this would have a very minor effect on GHG emissions estimates. GHG emissions associated with wastewater reuse in the agricultural industry represent less than 1% of total community-wide emissions in the 2005 base year inventory and approximately 1% of the total community-wide emissions in the adjusted 2035 business as usual scenario. CAP reduction strategies were not developed specifically to address this sector because greater reduction opportunity is available in other sectors (e.g., energy, solid waste). Please see also the response to comment 03-5.

**Comment 06-10** The commenter asks for clarification regarding wastewater reuse and tomato waste from the cannery.

Response: The following footnote has been added for wastewater reuse for Tables 4.5-1 and 4.5-7, on pages 4.5-4 and 4.5-22 respectively, in Chapter 4.5 “Climate Change, Greenhouse Gas Emissions and Energy”:

“Wastewater reuse emissions result from agricultural applications in which organic material in the wastewater biodegrades to create CO<sub>2</sub> and N<sub>2</sub>O, among the byproducts. This includes tomato washing, processing, and canning at Pacific Coast Producers, and the spray application of this tomato process wastewater to fields using sprinkler and surface irrigation.”

**Comment 06-11** The commenter states that the City should aim for Zero Net Energy beginning in 2017 with a goal of full implementation by 2020.

Response: As discussed in Section 4.5 of the Draft EIR, the Proposed Project would achieve a GHG emissions rate that is consistent with what the State of California would need to achieve goals for the State government under AB 32, Executive Order B-30-15, SB 32, and Executive Order S-3-05. The commenter raises a policy question and does not raise an issue regarding the adequacy of the Draft EIR. The City notes this comment and confirms that it is part of the record for consideration by decision makers.

**Comment 06-12** The commenter notes that Table 4-2-8 may include an error concerning the types of farmland in the different Specific Plan Areas.

Response: See response to comment 05-8.

## 2.15 COMMENT LETTER #07

07

To: Cindy A. Norris  
Principal Planner  
City Of Woodland, Ca.  
From: Glen Barton, Bruce Barton  
36 Grand Ave  
Woodland, Ca.  
Date: Sep 1, 2016  
Subject: My Comments on the "Public Review Draft General Plan" dated July 2016

My name is Glen Barton, and I am the owner of several properties within the City of Woodland and along the County Road 102 corridor adjacent to the city limits.

I would like to complement the planning team on their effort and a well thought out draft planning document that I generally support.

However, there are a few points in the draft plan that I cannot support. They concern my property located between County Road 102 and the Water Pollution Control Facility.

First, is the odor mitigation buffer depicted in Figure 7-6. It indicates that the unmitigated distance of the buffer is ½ mile. This puts my entire property within the unmitigated buffer. The mitigated buffer distance is 700 feet, which would affect about a quarter of the property. I am very strongly opposed to the ½ mile buffer, opposed to the 700 foot buffer, and would like to see a narrower buffer at least in the area that abuts to County Road 102, to allow for development on this less than prime agricultural land. I have been associated with this property since 1949, and it has been my experience that the prevailing winds are generally either from the North or the South. It is less often that the winds are from the East, therefore a much smaller buffer would be adequate unless we have an strong East wind.

I am also very strongly opposed to the plan concept (Policies 2.L.5, 7.F.6) proposing that before I can develop my property that I would have to pay for a mitigation study and actual mitigation of a public nuisance odor that the City created. If odor was such a nuisance, it should have been mitigated by the City during the plant upgrades in 1999, 2006, or 2016.

Second, is that I would object to any railroad relocation within one half mile of the CR102 corridor as being much too close to the city.

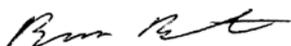
Third, in looking at the current city limits boundary, it looks like the City's intent is to completely surround my property by the city without giving us the benefit of being within the city limits. I am very strongly opposed to becoming an island community where city services and potential annexation could be held for ransom.

Thank you for allowing me to offer my comments and I am happy to answer any further questions about my comments.

Sincerely,



Glen Barton, Trustee  
The Glen A. Barton and Gloria L. Barton 1989 Trust



Bruce Barton, Successor Trustee

07-1

07-2

07-3

To: Cindy A. Norris  
Principal Planner  
City Of Woodland, Ca.  
From: Glen Barton, Bruce Barton  
36 Grand Ave  
Woodland, Ca.  
Date: Oct 24, 2016

Subject: Comments on the "Public Review Draft Environmental Impact Report" dated September 2016

In our letter to you, dated September 1, 2016 about the draft General Plan, we objected to the odor buffer around the Water Pollution Control Facility (WPCF). Since it appears that the draft EIR is using the same diagrams and refers to the same policies about WPCF odor mitigation as the draft General Plan, we are attaching that September 1st letter to this letter for your convenience and incorporating its comments by reference herein.

07-4

The DEIR mentions policy 2.L.5 at least a half dozen times which includes this wording: "...requires any development within the odor buffer to bear all costs associated with odor mitigation". We believe that the DEIR significantly underestimates the impacts from this policy, especially in the areas of: 1) impact to the cost of neighboring development, 2) delay of neighboring development due to odor mitigation costs, 3) disproportional cost impact to small development projects without deep pockets 4) cost of potential litigation over inequitable mitigation requirements by development projects with deep pockets. Further, policy 2.L.5 conflicts with General Plan policy 5.H.1 which includes this wording: "capital costs and benefits allocated equitably and fairly between existing users and new users, as authorized by law." (ref DEIR pages 4.9-36 and 4.14-35). We can support policy 5.H.1, but we strongly object to policy 2.L.5 because it is onerous and very inequitable. Furthermore neighboring landowners should not have to bear the complete mitigation cost of a City created problem. In any other situation the City, County, etc. would bring action against the sole source of the odor problem.

07-5

On page 4.3-9, the DEIR states that the YSAQMD only received 2 complaints about sewer smell in a 5 year period (2011-2016), with no violations noted by the YSAQMD. Further, on page 4.3-13, the DEIR states "...the City receives infrequent odor complaints regarding the WPCF and it has been determined that existing residents to the west of County Road 102 could detect odors approximately 40 hours per year, or 0.4 percent of the time (City of Woodland 2015)". It doesn't seem to us that this very infrequent odor would justify a buffer as wide as depicted in General Plan Figure 7-6. On page 4.3-46, the DEIR further states "...the determination of significance should be based on whether odor complaints from the public have occurred in the vicinity of a similar facility at a similar distance". It is our belief that this statement is incorrect because the impacts of facilities cannot be considered 'similar' due to every facility having differences in equipment, locational influences, weather patterns, and physiological odor receptors, at the very least.

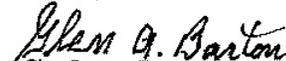
07-6

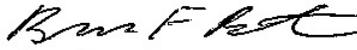
On the subject of rail relocation of the existing north/south line along East St, the target location of the relocated rail line was only vaguely specified. If the target location is near the County Road 102 corridor, we feel that the DEIR has underestimated the impacts of splitting the city limits with this rail line. If the target location is east of any city limits or the ULL, we feel the DEIR is adequate, and we would support that eastern location.

07-7

Thank you for allowing us to offer our comments. If you have further questions, feel free to contact us.

Sincerely,

  
Glen Barton, Trustee

  
Bruce Barton, Successor Trustee

The Glen A. Barton and Gloria L. Barton 1989 Trust

## 2.16 RESPONSE TO COMMENT LETTER #07

**Comment 07-1** The commenters express opposition to the use of an odor mitigation buffer. The commenters are opposed to Policies 2.L.5 and 7.F.6, which require odor mitigation and would like to see a narrower buffer in at least the area that abuts to CR 102 so that development would be allowed there. The commenters believe that a much smaller buffer would be adequate unless there is a strong East wind.

Response: The odor mitigation buffer distances were based on the City’s “Technical Report Evaluating General Plan Impacts on the City’s Water Pollution Control Facility,” which addresses potential exposure to odor associated with the City’s wastewater treatment plant, known as the “Water Pollution Control Facility” (WPCF) and identifies strategies that could be used to reduce potential effects. The study above is available with the City for further review, at the Department of Community Development, 300 First Street, in Woodland. This comment does not relate to the adequacy of the Draft EIR in addressing potential environmental effects associated with the Proposed Project. It raises policy issues which are noted and will be considered by decision makers.

**Comment 07-2** The commenters are opposed to the railroad relocation within one-half mile of the County Road 102 corridor as the commenter believes it is too close to the city.

Response: This comment does not relate to the adequacy of the Draft EIR in addressing potential environmental effects associated with the Proposed Project. This comment raises policy issues which are noted and will be considered by decision makers.

**Comment 07-3** The commenters state that it appears that the City wants to completely surround their property without including the commenter’s property within City limits, and the commenter is opposed to becoming an island community.

Response: The General Plan applies to the entire incorporated City plus an area that is currently outside City limits that includes the commenters’ property, and is identical to the Urban Limit Line (ULL) established by City of Woodland voters in 2006. The baseline assumption of the approved ULL was that eventually all lands within in ULL boundary would be annexed. The rate and location and timing of that process are the subject of the current general plan update and likely future General Plans. The discussion concerning potential future growth and the final 2035 General Plan will be considered by policy makers.

This comment does not relate to the adequacy of the Draft EIR in addressing potential environmental effects associated with the Proposed Project. This comment raises policy issues that are noted and included here for consideration by decision makers.

**Comment 07-4** The commenters indicate that they objected to the odor buffer in September 2016.

Response: See response to comment 07-1, above.

**Comment 07-5** The commenters state that the Draft EIR significantly underestimates the costs and possible

delay associated with Policy 2.L.5. The commenters state that this policy conflicts with General Plan Policy 5.H.1. See response to comment 07-1, above.

Response: This comment raises a policy concern appropriate for decision makers to consider but does not raise an issue regarding the adequacy of the Draft EIR.

**Comment 07-6** The commenters state that infrequent odor complaints would not justify a wide odor mitigation buffer. The commenters state that every facility is different and takes issue with the odor significance thresholds used in the Draft EIR on page 4.3-46.

Response: Regarding the statement on page 4.3-46 of the Draft EIR, this is guidance from the Yolo-Solano Air Quality Management District (YSAQMD) on assessing potential odor-related impacts. Page 31 of YSAQMD's CEQA reads:

“Probably the most effective mitigation measure available to reduce odor impacts is the establishment of a buffer between the odor source and the nearest receptor. The dimensions of the buffer zone should ensure that the project does not expose the public to nuisance levels of odorous emissions... In order to determine the appropriate buffer distance, a Lead Agency can research similar facilities to ascertain whether odor complaints have been registered by nearby receptors.”

See also response to comment 07-1, above.

**Comment 07-7** The commenters state that the Draft EIR is vague on the location of the potential rail relocation and that its ultimate location would impact the adequacy of the EIR.

Response: The location of the railroad, were it to be moved, is intentionally left unspecified in the Draft General Plan and the Draft EIR because it is speculative. While relocating the rail line is a goal of the Draft General Plan, details of this effort are not known at this time and thus the physical and environmental impacts associated with it cannot be analyzed with any confidence. When a proposal to relocate the rail line emerges, it will be subject to a project-level environmental review.

## 2.17 COMMENT LETTER #8



# Yolo County Farm Bureau

P O Box 1556, Woodland CA 95776  
530.662.6316 O \* 530.662.8611 F  
www.yolofarmbureau.org

**08**

PRESIDENT  
Jeff Merwin  
1<sup>ST</sup> VICE PRESIDENT  
Joe F. Martinez  
2<sup>ND</sup> VICE PRESIDENT  
Nancy Lea  
SECRETARY/TREASURER  
Denise Sagara

October 3, 2016

[WoodlandGPDEIRcomments@cityofwoodland.org](mailto:WoodlandGPDEIRcomments@cityofwoodland.org)  
c/o Cindy Norris, Principal Planner  
Woodland City Community Development Department  
300 First Street  
Woodland, CA 95695

Dear Cindy;

Thank you for the opportunity to make comments regarding the 2035 City of Woodland's General Plan Update. As President of the Yolo County Farm Bureau I represent many growers and agricultural businesses. The primary function of the Farm Bureau is to promote and protect Yolo County's agriculture.

One of the very important facilities in Yolo County is the 40<sup>th</sup> District Agriculture Association, commonly known as the Yolo County Fairgrounds. This facility is used extensively for a wide variety of events, but the original purpose was to be a home for the Yolo County Fair, which included agriculturally based events including the Livestock auction. Many members of both 4-H FFA chapters use the facility to raise their animals. Without the facility they would not be able to raise animals.

The location within the City of Woodland makes it easily and safely accessible for these members – many can walk or ride their bikes to the fairgrounds. Moving it out of town would make it inaccessible, and probably dangerous to walk or ride bikes. Further, this topic was discussed in great detail a few years ago and died because there was no feasible location identified as a better location. In addition the cost to move the facility at that time was estimated at \$28 million and costs have only escalated.

I strongly urge you to not include moving the Yolo County Fairgrounds in the 2035 General Plan update.

Sincerely,

Jeff Merwin  
President

Cc: California Farm Bureau Federation  
40<sup>th</sup> District Agricultural Association

08-1



## 2.18 RESPONSE TO COMMENT LETTER #8

**Comment 08-1**            The commenter urges the City not to relocate the Yolo County Fairgrounds as a part of the 2035 General Plan update.

Response: This comment pertains to the Draft General Plan rather than the substance of the Draft EIR and does not raise any substantial environmental issues. The Draft General Plan does not include any goals or policies specifically related to relocation of the Fairgrounds. The City is contemplating a policy in general support of the fairgrounds, whether at the current location or a new one.

## 2.19 COMMENT LETTER #09

09



DEVELOPMENT ADVISORY SERVICES  
P.O. Box 6763 | Folsom, CA 95763-6763 - 916.502.7341

November 3, 2016

Mr. Ken Hiatt  
Community Development Director  
City of Woodland  
300 First Street  
Woodland, CA 95695

RE: Comments on the Public Review Draft – Draft Environmental Impact Report (DEIR) for the Woodland General Plan.

Dear Ken:

Thank you for the opportunity to provide you comments on the above referenced DEIR for the City of Woodland “General Plan Update” documents. I am happy to provide you with the following comments (see attachment) in an effort to assist you in this important planning process.

Please call me if you have any questions or need clarification on any comment that I have presented.

Sincerely,

David A. Storer, AICP  
Principal  
DAS – Development Advisory Services  
(on behalf of the Knaggs Commercial Trust)

Attachment 1) Comments on the Draft Environmental Impact Report for the City of Woodland General Plan

cc: Cindy Norris, Principal Planner, Woodland City Community Development Department  
Ken Astle, Knaggs Commercial Trust, 83 Scripps Drive, Sacramento, CA 95825  
Scott Daley, Knaggs Commercial Trust, 83 Scripps Drive, Sacramento, CA 95825

**Comments on the DEIR**

- General Note: Please state at appropriate locations throughout the DEIR that the northerly boundary of SP 3-A with the Flood Study area (FS) is approximate and does not reflect the ultimate boundary of the flood solution. Alternatively, modify the aforementioned boundary to reflect the current “Modified 2A boundary” – which is the City “preferred flood solution boundary” as adopted by the City Council.** 09-1
- Section 4.3 Air Quality. Page numbers to start from 4.3-1 per rest of document. 09-2
- P. 2-1 Add word “to” after “evidence” in section 2.2.1 09-3
- p. 2-8 Add “but not be” in parenthesis of 2<sup>nd</sup> paragraph at 3rd bullet – word is “Influence” 09-4
- p. 2-9 Section 2.9 word “section” to be “Chapter” 09-5
- p. 2-10 Same error as above 09-6
- p. 3-5 Section 3.2.1.1 – last sentence to be removed to state “This EIR includes analysis for that SOI amendment in order to assist LAFCo in its environmental review of the City’s future application”. 09-7
- p. 3-14 Bullet # 10. After 2<sup>nd</sup> sentence add “It is recognized that new development shall not pay for existing deficiencies in public services”. 09-8
- p. 3-20 Penultimate paragraph – Reference to “comprehensive flood solution and supporting funding have been secured” Please add language consistent with - p. 4.9-51 - 5<sup>th</sup> Paragraph 09-9
- p. 3-21 Last paragraph - Reference to “comprehensive flood solution and supporting funding have been secured” Please add language consistent with - p. 4.9-51 - 5<sup>th</sup> Paragraph 09-10
- p. 3-25 Table 3.7-5 - Reference to “comprehensive flood solution and supporting funding have been secured” Please add language consistent with - p. 4.9-51 - 5<sup>th</sup> Paragraph 09-11
- p. 3-25 Section 3.7.2 – the 2035 General Plan does not contain an “Administration” chapter. 09-12

p. 3-48	Section 3.8.2.3 – Two reference to “comprehensive flood solution and supporting funding have been secured” Please add language consistent with - p. 4.9-51 - 5 <sup>th</sup> Paragraph	09-13
p. 3-50	Section 3.9 – the document should explain why the East Street Corridor Specific Plan is being repealed.	09-14
p. 3-50	Section 3.10 – the first sentence should be amended to read “...have an interest in specific environmental issues” in the City. They do not have “control”...	09-15
p. 3-51	Section 3.11 – Penultimate paragraph – add after the word “delegates” the words, “,transfers or assigns”.	09-16
p. 4.0-2	Section 4.0.2.1 – add “(2013)” after the words “NOP was filed”	09-17
p. 4.2-8	Section 4.2.2.5 – reference should be to Section 4.2.3 Regulatory Setting?	09-18
p. 4.2-8	Same section as above. The narrative only explains the location of 10 of the 11 Williamson Act contracts.	09-19
p. 4.2-25	Bullet of “Agricultural Mitigation” has a reference to subsections which are not in the DEIR. Delete references.	09-20
p. 4.2-33	Reference to policy in the General Plan (2.B.1) to be eliminated. Same page – table 4.2 12 – Reference to “comprehensive flood solution and supporting funding have been secured” Please add language consistent with - p. 4.9-51 - 5 <sup>th</sup> Paragraph	09-21
p. 4.2-34	Table 4.2-13 - Reference to “comprehensive flood solution and supporting funding have been secured” Please add language consistent with - p. 4.9-51 - 5 <sup>th</sup> Paragraph	09-22
p. 4.2-35	Add the word “City” before the word “public services in the first paragraph. Same page – The discussion under PP 4.2-1 suggests that “the loss of farmland cannot be completely mitigated”. However, if the lands lost to development are mitigated with lands that are equal to or better and at the same size (or larger), then how is the lost farmland not being “completely” mitigated. The mitigation after implementation is surely NOT “significant and unavoidable” but can be categorized as “Less than Significant”. The whole purpose of the mitigation is to improve the environment and the proposed mitigation measure does that as presently constituted.	09-23 09-24

p. 4.2.36	Discussion only describes 5 of the 11 Williamson Act contracts. Are there only 10?	09-25
p. 4.2-38	Impact 4.2-3 – See discussion above. The Impact is significant but reduced to a level of “Less than Significant” after mitigation 4.2-3 - (see Policy 7.C.5 – Agricultural Buffer. The summary of impact on p. 4.2-41 should be changed to “Less than Significant” as impacts to loss of farmland are mitigated.	09-26
p. 4.10-3	Section of Agriculture – there is a description of the Master Plan Remainder area but it is not described anywhere?	09-27
p. 4.10-5	Population at 4.10.2.2 is incorrect. It should read 57,526 for 2016.	09-28
p. 4.10-19	Specific Plans: make note that the East Street Corridor SP is to be repealed?	09-29
p. 4.10-28	Second paragraph – the word “environed” is awkward? What does it mean?	09-30
p. 4.10-30	Reference to “comprehensive flood solution and supporting funding have been secured” Please add language consistent with - p. 4.9-51 - 5 <sup>th</sup> Paragraph	09-31
p. 5-22	Reference to “comprehensive flood solution and supporting funding have been secured” Please add language consistent with - p. 4.9-51 - 5 <sup>th</sup> Paragraph	09-32
p. 5-36	Section 5.5.5.1 – penultimate sentence on page is not a sentence	09-33
p. 5-47	Reference to “comprehensive flood solution and supporting funding have been secured” Please add language consistent with - p. 4.9-51 - 5 <sup>th</sup> Paragraph	09-34
p. 5-48	Table 5-16 includes reference to “comprehensive flood solution and supporting funding have been secured” Please add language consistent with - p. 4.9-51 - 5 <sup>th</sup> Paragraph	09-35
p. 5-49	Last paragraph – appears to be a typo – there will be non-residential development in SP-3. Perhaps the reference should be SP1C or somewhere else?	09-36
p. 5-62	Section 5.6 – The second chevron should be pointing to the right – at present they both point left.	09-37

p. 5-63	Table 5-24 contains an error and thus totals should be amended. See Climate change, Greenhouse, Gas Emissions and Energy. The East Alternative has chevron pointing to the right and the south Alternative has and equals sign for the East Alternative. How can they be inconsistent? The South alternative should have the chevron pointing to the left to be less than the East alternative.	 09-38 
p. 5-64	Narrative to be modified with correct totals per discussion above.	 09-39 
p. 6-22	Section on "Cumulative Scenario" – What happens if the Yolo HCP/NCCP is never completed and or adopted by the City? And if completed, what if the City chooses to not be a partner/signatory?	 09-40 
p. 6-37	Second paragraph – Please cite the "City's policies" that "prevent conversion of additional agricultural land outside of the ULL? Perhaps the author is referring to the voter approved actions – is there a municipal code reference or map?	 09-41 
p. 4.9-50	Impact 4.9-5 - Reference to "comprehensive flood solution and supporting funding have been secured" Please add language consistent with - p. 4.9-51 - 5 <sup>th</sup> Paragraph	 09-42 
p. 4.9-51	5 <sup>th</sup> Paragraph - This language is acceptable and should be contained in the General Plan also, as it references the DWR language of "Urban Level of Flood Protection" (ULOP) and also references State law. The DEIR should be amended in all places to be consistent with this language. Alternatively, please add to all cited references to the "flood solution" the following "...after funding has been secured, consistent with DWR's urban level of flood protection (Nov. 2013) and with government code sections 65007 (a-c), 65865 (a-c), 65962 (a-c) and 66474.5 (a-c) or as presently constituted.	 09-43 
p. 6-48:	Last paragraph – after the penultimate sentence, <u>add</u> citation and provide copy of "vote of the people" as an attachment.	 09-44 

## 2.20 RESPONSE TO COMMENT LETTER #09

**Comment 09-1** The commenter requests clarifications regarding the boundary of the Flood Study Area and SP-3A. The commenter requests that the Draft EIR state that the northerly boundary of SP3-A with the Flood Study area is approximate and does not reflect the ultimate boundary of the flood solution or that the boundary be amended to reflect the “Modified 2A boundary.”

Response: This comment does not pertain to the adequacy of the Draft EIR in analyzing potential adverse environmental effects and is included as a comment here for decision maker consideration in finalizing the General Plan.

**Comment 09-2** The commenter requests that page numbers in Section 4.3 of the Draft EIR be changed to match the format of the rest of the document.

Response: The EIR has been revised accordingly.

**Comment 09-3** The commenter notes a missing word.

Response: The text on Page 2-1 “Executive Summary” has been revised to read as follows: “The purpose of an EIR is neither to recommend approval nor denial of a project but rather to provide substantial evidence to support such a decision.”

**Comment 09-4** The commenter identifies two errata in the Executive Summary.

Response: These corrections have been made. Please refer to Chapter 3 of the Final EIR, which summarizes revisions to the Draft EIR.

**Comment 09-5** The commenter notes that under 2.9 on Page 2-9, the text in the first paragraph should say Chapter 4, not Section 4.

Response: The text has been revised to read as follows: “...environmental issues discussed in ~~Section~~Chapter 4 of this EIR...”

**Comment 09-6** The commenter notes that under 2.9 on Page 2-10, the text in the first paragraph should say Chapter 4, not Section 4.

Response: The text has been revised to read as follows: “Cumulative impacts are described in detail in ~~Section~~Chapter 6 of this EIR...”

**Comment 09-7** The commenter requests a revision to clarify LAFCO’s role subsequent to the approval of the EIR.

Response: The existing language was accurate, but the Project Description has been revised for additional clarity. The last sentence in Section 3.2.1.1 on Page 3-5 of “Project Description” has been revised to read as follows: “This EIR comprehensively addresses potential impacts associated with the Proposed Project, including any changes to the City’s SOI that may be requested.” ~~provides CEQA coverage for that SOI amendment.~~

**Comment 09-8** The commenter suggests adding a sentence to the 2035 General Plan Guiding Principle #10.

Response: This comment pertains to the 2035 General Plan rather than the Draft EIR. Rather than being addressed further in this document, the suggestion will be included as part of the record of comments on the Draft General Plan considered by the Planning Commission and City Council.

**Comment 09-9** The commenter suggests adding language consistent with page 4.9-51 5<sup>th</sup> paragraph to discussion of the potential development in the flood hazard area under the East Alternative.

Response: The last paragraph on page 3-20 has been revised to refer to the related General Plan policy:

“According to the 2035 General Plan, development in the new growth areas is expected to occur in phases, as shown in Table 3.7-5. Development of SP-1A is anticipated to occur first, likely between 2016 and 2025. Development of SP-2 and residential development in SP-3A is expected to occur later, though the exact timing is uncertain as Specific Plans for these areas may not be approved until a comprehensive flood solution and supporting funding have been secured (see 2035 General Plan Policy 2.B.2). Development of SP-3B and the Southern Gateway business park in SP-1B can proceed at any time. Development of the remainder of SP-1B and SP-1C is not permitted prior to 2035 without a comprehensive General Plan Update and accompanying EIR.”

Federal and state regulatory requirements are detailed in Section 4.9 of the Draft EIR, “Hydrology and Water Quality.” As described on page 4.9-19, Federal Emergency Management Agency (FEMA) regulations that limit development in floodplains. The design standard for flood protection is the 1-in-100 annual exceedance probability (AEP) (i.e., the 100-year flood event). As discussed on page 4.9-23 of the Draft EIR, the Central Valley Flood Protection Act of 2008 establishes that 200-year protection is to be the minimum urban level of flood protection.

**Comment 09-10** The commenter suggests adding language consistent with page 4.9-51 5<sup>th</sup> paragraph to discussion of the potential development in the flood hazard area under the South Alternative.

Response: The last paragraph on page 3-21 has been revised to refer to the related General Plan policy:

“According to the 2035 General Plan, development in the new growth areas is expected to occur in phases, as shown in Table 3.7-5. Development of SP-1A is anticipated to occur first, likely between 2016 and 2025. Development of SP-1B and SP-1C is expected to follow, approximately between 2026 and 2035. The exact timing for the development of SP-3A is uncertain as a Specific Plan for this area may not be approved until a comprehensive flood solution and supporting funding have been secured (see 2035 General Plan Policy 2.B.2). Development of SP-3B and the Southern Gateway business park in SP-1B can proceed at any time. Development of SP-2 is not permitted prior to

2035 without a comprehensive General Plan Update and accompanying EIR, and is not planned to occur before 2035 under the South Alternative.”

**Comment 09-11** The commenter suggests adding language consistent with page 4.9-51 5<sup>th</sup> paragraph to Table 3.7-5.

Response: Federal and State regulatory requirements are detailed in Section 4.9 of the Draft EIR, “Hydrology and Water Quality.” As described on page 4.9-19, Federal Emergency Management Agency (FEMA) regulations that limit development in floodplains. The federal design standard for flood protection is the 1-in-100 annual exceedance probability (AEP) (i.e., the 100-year flood event). As discussed on page 4.9-23 of the Draft EIR, the Central Valley Flood Protection Act of 2008 establishes that 200-year protection is to be the minimum urban level of flood protection applicable to Woodland. Policy 2.B.2 in the Draft General Plan will establish the City’s policy with regard to a flood solution. The requested changes to the Draft EIR are not needed.

**Comment 09-12** The commenter states that the 2035 General Plan does not contain an Administration Chapter.

Response: The referenced statement refers to the “Introduction and Administration” Chapter. See Section 1.8 “Administration on Page IA 1-23 of the General Plan.

**Comment 09-13** The commenter suggests adding language consistent with page 4.9-51 5<sup>th</sup> paragraph to Section 3.8.2.3.

Response: Please see response to comment 09-11.

**Comment 09-14** The commenter requests explanation of why the East Street Corridor Specific Plan would be repealed upon adopted of the 2035 General Plan.

Response: The last sentence under Section 3.9 “Adoption and Implementation,” has been revised on page 3-51 to read as follows:

“This will include repeal of the East Street Corridor Specific Plan because the City has deemed that the 2035 General Plan will better meet the community’s goals for the East Street Corridor than the Specific Plan that was adopted in 1998.”

**Comment 09-15** The commenter states that the “agencies expected to use this EIR” have an “interest” not a “control” over the environmental concerns in the City.

Response: The text has been revised on Page 3-50 under Section 3.10 “Agencies Expected to Use this EIR,” to read as follows:

“A number of other jurisdictional and permit-granting agencies have ~~control over specific environmental concerns in the City~~ jurisdiction over activities that could occur within the City’s Planning Area during implementation of the Proposed Project.”

**Comment 09-16** The commenter states a preferred revision.

Response: This comment does not relate to the adequacy of the Draft EIR for addressing potential environmental effects associated with the Proposed Project. The text on page 3-51 of “Project Description,” has been revised to read as follows:

“Unless otherwise specified, any reference to “consulting with” or “coordinating with” other agencies in no way delegates, transfers, or assigns the City’s responsibility...”

**Comment 09-17** The commenter asks that the year of the EIR Notice of Preparation (NOP) be added.

Response: The text has been revised on Page 4.0-2 of “Environmental Impact Analysis,” to read as follows:

“This subsection provides relevant information about the existing physical environment related to the particular environmental topic. In accordance with Section 15125 of the CEQA Guidelines, the discussion of the physical environment describes existing conditions within the City at the time the initial NOP was filed (2013)—unless otherwise noted.”

**Comment 09-18** The commenter notes that Section 4.2.2.5 on page 4.2-8 should be changed to Section 4.2.3, “Regulatory Setting.”

Response: The term “Regulatory Framework” is correct. The reference has been changed to Section 4.2.3.

**Comment 09-19** The commenter notes that only 10 of 11 locations of Williamson Act contracts adjacent to the Planning Area are explained.

Response: The last sentence in the last paragraph under Section 4.2.2.5 “Williamson Act Land in the Planning Area,” has been revised to read as follows:

“As shown in Exhibit 4.2-2, as of FY 2010/2011 there are Williamson Act properties adjacent to the Planning Area. Based on communication with the Yolo County Assessor’s Office, there have been no new Williamson Act contracts added in Yolo County since FY 2010/2011 (Yolo County Assessor’s Office 2016). As of FY 2010/2011, there are eleven Williamson Act contracts adjacent to the Planning Area and several near the Planning Area. Two properties under Williamson Act contract are located along the northern edge of the Planning Area; two are west of SP-3; two are adjacent to SP-1C; three are adjacent to SP-1B; ~~and~~ one is adjacent to the Spring Lake Specific Plan area; and one is southeast of the southeastern corner of the City’s Planning Area.”

**Comment 09-20** The commenter notes that a bullet of “Agricultural Mitigation” on page 4.2-25 has a reference to subsections that are not in the Draft EIR.

Response: The term “Agricultural Mitigation” is a header within an existing Yolo County LAFCo Agricultural Conservation Policy and is not new text in the Draft EIR. Accordingly,

no changes have been made to the Draft EIR.

**Comment 09-21** Commenter suggests removing reference to 2035 General Plan Policy 2.B.1.

Response: No changes have been made since Policy 2.B.1 furthers the objective of orderly growth and infill development, which reduces development pressure on agricultural land.

**Comment 09-22** The commenter suggests adding language consistent with page 4.9-51 5<sup>th</sup> paragraph to Table 4.2-13.

Response: Please see response to comment 09-11.

**Comment 09-23** The commenter suggests adding the word “City,” before “public services” on page 4.2-35 in the first paragraph.

Response: This comment does not relate to the adequacy of the Draft EIR for addressing potential environmental effects associated with the Proposed Project. This change has been made.

**Comment 09-24** The commenter comments that loss of farmland can be mitigated with conservation of farmland of greater or equal quality.

Response: Farmland is an irreplaceable and finite resource. Mitigation programs neither replace the converted land nor create new farmland. There is still a net loss of the resource. Therefore, the impact is not fully mitigated under CEQA.

**Comment 09-25** The commenter notes detail missing in the description of Williamson Act contracts adjacent to the Planning Area.

Response: The third paragraph under “Potential Impacts Associated with Implementation of the Proposed Project,” has been revised to read as follows:

“As shown in Exhibit 4.2-2, ~~two properties are located north of the Planning Area adjacent to land that is designated Flood Study Area; two are located west of SP-3 and adjacent to land that is already developed; and one is south of the Spring Lake Specific Plan;~~ two properties under Williamson Act contract are located along the northern edge of the Planning Area; two are west of SP-3; two are adjacent to SP-1C; three are adjacent to SP-1B; and one is adjacent to the Spring Lake Specific Plan area.; and one is adjacent to the southeast corner of the Planning Area.”

**Comment 09-26** The commenter comments that the summary of impact for Impact 4.2-3 should be revised from “significant and unavoidable” to “less than significant with mitigation.”

Response: This comment is noted, but no changes have been made to the EIR. Although the agricultural buffer will help prevent conflict between urbanized areas and surrounding farmland, it cannot be guaranteed that farmland would not be indirectly impacted by development envisioned in the Plan. Therefore, the impact is significant and unavoidable.

**Comment 09-27** The commenter states that the Draft EIR mentions the Master Plan Remainder Area but that there is not a description.

Response: The Master Plan Remainder Area is west of the Spring Lake Specific Plan Area, west of County Road 101 and south of Road 24.

**Comment 09-28** The commenter provides the population counts for 2016 and states that the Draft EIR's population is inaccurate.

Response: At the time of Draft EIR preparation, the 2016 population figures were not available yet to the City. The 2016 population number does not affect the analysis or conclusions presented in the Draft EIR. No change is warranted.

**Comment 09-29** The commenter suggests the addition of text describing that the East Street Corridor Specific Plan is proposed to be repealed.

Response: The paragraph under "East Street Corridor Specific Plan, 1998, Revised 2005," on page 4.10-19 has been revised to include the following text at the end of the paragraph:

"As discussed in the Project Description under Section 3.9, following adoption of the 2035 General Plan, the City will begin the process of updating active specific plans, master plans, and other implementation documents to be consistent with the new plan, and reflect the adopted policy language, and design and development guidance. This will include repeal of the East Street Corridor Specific Plan because the City has deemed that the 2035 General Plan will better meet the community's goals for the East Street Corridor than the Specific Plan that was adopted in 1998."

**Comment 09-30** The commenter asks for a definition of the word "environed" on page 4.10-28.

Response: The City notes this is a typographical error. The word has been corrected to be "envisioned."

**Comment 09-31** The commenter suggests adding language consistent with page 4.9-51 5<sup>th</sup> paragraph to the discussion of impacts from the Proposed Project on page 4.10-30.

Response: Please see response to comment 09-11.

**Comment 09-32** The commenter suggests adding language consistent with page 4.9-51 5<sup>th</sup> paragraph to discussion of a flood solution on page 5-22.

Response: The reference to a comprehensive flood solution on page 5-22 is an excerpt from Policy 2.L.5 of the Draft General Plan. This comment addresses text changes in the Draft General Plan, rather than the adequacy of the EIR or specific environmental effects.

**Comment 09-33** The commenter identifies that the second to last sentence on page 5-36 is not complete. The sentence has been revised to read as follows:

Since “The No Project Alternative would include less development than the East and South Alternatives in terms of number of dwelling units, added population, amount of new non-residential square footage, and number of employees.”

**Comment 09-34** The commenter suggests adding language consistent with page 4.9-51 5<sup>th</sup> paragraph to the discussion of flooding impacts in Section 5.5.9.5 on page 5-47.

Response: Please see response to comment 09-11.

**Comment 09-35** The commenter suggests adding language consistent with page 4.9-51 5<sup>th</sup> paragraph to Table 5-16.

Response: The note on Table 5-16 is consistent with the discussion of potential development and the comprehensive flood solution on page 4.9-51

**Comment 09-36** The commenter notes a typo on page 5-49.

Response: The last sentence on page 5-49 has been revised to read as follows:

“Compared to the East Alternative, more non-residential development would occur within the Downtown area, and no ~~non-residential~~ development would occur in SP-32 (Table 5-3).”

**Comment 09-37** The commenter notes a typo.

Response: The last sentence on Page 5-62 “Alternatives,” has been changed to use this symbol “>,” when referring to a greater overall impact.

**Comment 09-38** The commenter suggests that Table 5-24 be revised to reverse the stated impact conclusions of alternative comparisons for Climate Change, GHG Emissions and Energy impacts.

Response: Under the entry for “East Alternative” the symbol for the South Alternative has been changed to “=.”

**Comment 09-39** The commenter notes that the changes from comment 09-38 should be reflected throughout Chapter 5.

Response: No change has been made to Section 5.5.5 “Climate Change, Greenhouse Gas Emissions, and Energy,” as the analysis is correct and consistent with the change made to Table 5-25, and reflected in response to comment 09-38.

**Comment 09-40** The commenter references page 6-22 concerning the cumulative impact associated with the loss of giant garter snake and asks what would happen if the Yolo County Habitat Conservation Plan/Natural Communities Conservation Plan (HCP/NCCP) is never completed or is never adopted by the City. The commenter also asks what would happen if the City chose not to participate.

Response: If the HCP/NCCP is not completed or adopted by the City, the City would still be

required to comply with the federal and State Endangered Species Act requirements to reduce potential impacts on giant garter snake. The City is already a legal member of the Joint Powers Agency and the City Council has directed the City's continued participation in the effort.

**Comment 09-41** The commenter notes that a reference to the "City's policies" is unclear with regards to City policies that prevent conversion of additional agricultural land outside of the Urban Limit Line.

Response: The Draft EIR has been revised to clarify that the reference is to the voter-approved Urban Limit Line (ULL), which established policy for the City in the form of voter approved amendments to the General Plan.

**Comment 09-42** The commenter suggests adding language consistent with page 4.9-51 5<sup>th</sup> paragraph to Impact 4.9-51 on page 4.9-50. The commenter also asks what would happen if the City chose not to participate.

Response: The language on page 4.9-50 regarding development in flood hazard areas is a brief summary of the discussion of potential impacts that follows. No changes to the Draft EIR have been made.

**Comment 09-43** The commenter supports the language regarding the flood solution and recommends all other relevant language be consistent with the 5th paragraph of page 4.9-51.

Response: Please see response to comment 09-11.

The second paragraph under Impact 4.9-6 on page 4.9-58, and also on page 4.9-59 has been revised to read as follows:

"...with funding secured, consistent with DWR's urban level of flood protection (Nov. 2013), and with Government Code Sections 65007 (a-c), 65865 (a-c), 65962 (a-c), and 66474.5 (a-c) or as presently constituted."

**Comment 09-44** The commenter suggests adding a citation to the Urban Limit Line (ULL) ballot measure and providing a copy of it as an attachment.

Response: While not required to be included as an attachment to the Draft EIR, the measure is attached as a convenience. This is Appendix A of the Final EIR.

## 2.21 COMMENT LETTER #10

10



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Timothy D. Taron  
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November 3, 2016

*Via E-mail and U.S. Mail*

Cindy Norris, Principal Planner  
Woodland Community Development Department  
300 First Street  
Woodland, CA 95695

**Re: Eastland Ventures, LLC's Comments on DEIR**

Dear Ms. Norris:

Eastland Ventures, LLC, submits the following comments on the 2035 General Plan and Climate Action Plan Public Review Draft Environmental Impact Report (hereinafter "DEIR"). Defined terms correspond to those used in the aforementioned document.

- The DEIR cites policies included in the Public Review Draft General Plan as reducing certain impacts associated with the Proposed Project. Moreover, the DEIR discusses these policies as "control[ling] the timing, location, and sequence under which the Planning Area could build out through the planning horizon year (2035), specifically with regard to development in new Specific Plan Areas under the East and South Alternatives." See p. 1-9. Problematically, the two project alternatives selected by the City Council did not include certain of the policies included in the DEIR, including, but not limited to, Land Use Policies 2.B.1, 2.B.2, 2.L.1, 2.L.5, and 2.L.6, Conservation and Open Space Policy 7.F.6, and Safety Policy 8.B.3. Inclusion of these policies is therefore improper, and the Final EIR should clarify these policies are not intended as mitigation measures. 10-1
- Table 4-2.8, "Acres of Each Type of Farmland in SP-1, SP-2, and SP-3," contains a typographical error, and is internally inconsistent with the balance of the DEIR. That table concludes SP-1 includes only 134.5 acres total of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland, whereas Table 5-6 concludes SP-1 includes 816.4 acres total of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. All acreage references should be confirmed and corrected, as necessary. 10-2
- The DEIR improperly classifies the land within SP-2 as being comprised primarily of Farmland of Statewide Importance and Unique Farmland in reliance on the California Department of Conservation's Farmland Mapping and Monitoring Program. See, 10-3

e.g., Exhibits 4.2-1 and 4.2-7. As set forth in the agriculture suitability analysis attached hereto as Exhibit 1, the classifications used in the DEIR ignore the high degree of salts present in the soils in SP-2, which make it nearly impossible to grow a crop that will produce a reasonable economic return. Based on actual soil conditions, the property should be classified as Other Land, not as Farmland of Statewide Importance and/or Unique Farmland. Based on this error, the DEIR fails to crystallize the issues with respect to each alternative's respective impacts to agricultural resources and, as a result, affords an improper basis for comparison.

10-3  
cont.

- The DEIR erroneously describes the habitat values of SP-2 in its analysis of impacts on biological resources. For example, the DEIR describes SP-2 as supporting 182 acres of cultivated rice fields. See, e.g., p. 4.4-40. In another location, the DEIR concludes development of SP-2 would allow for conversion of approximately 472 acres of cultivated rice fields that provide suitable habitat for Giant Garter Snake, notwithstanding the fact that said number is greater than the total number of developable acres in SP-2 under the East Alternative. See p. 5-35. Neither of the foregoing numbers is accurate, and similar errors appear throughout the Biological Resources chapter with respect to habitat values in SP-2. As a result of such errors, the DEIR fails to provide a proper basis for comparison of impacts to biological resources between the two alternatives.

10-4

- The most significant difference between the East and South Alternatives is their respective impact on prime agricultural land, yet the discussion of the environmentally superior alternative ignores this issue altogether. Moreover, section 5.7 summarily concludes the South Alternative would have fewer impacts compared to the East Area for air quality, biological resources, cultural resources, hydrology, flooding, and water quality. As noted above, certain of these determinations are based on incorrect information on which the DEIR relies (e.g., agricultural and biological resources). Moreover, these determinations ignore that for other of these impacts (e.g., air quality), the impacts associated with the South Alternative are, as the DEIR puts it, "slightly less," simply because slightly more non-residential square footage was assigned to the East Alternative. Accordingly, the discussion of the environmentally superior alternative is devoid of meaningful analysis and, as a result, reaches an incorrect conclusion.

10-5

- The DEIR describes that "[w]ithin the Flood Study Area, residential, commercial, and industrial uses are not allowed under the action alternatives." See p. 4.4-29. Similar to the first bullet point above, said language is inconsistent with representations that have been made to date, namely, that if a flood study area is deemed unnecessary for flood control infrastructure, said area will be added to the adjacent specific plan areas. Therefore, the Final EIR should not include the above-quoted language, and should

10-6

- instead examine the potential impacts of future development in the Flood Study Areas adjacent to SP-2 and SP-3. 10-6  
cont.
- The DEIR ignores the feasibility of extending its recycled water program via its new recycled water utility to serve SP-2 and, similarly, fails to consider that SP-2 is within the place of use for Conaway Preservation Group’s surface water rights. Said omissions distort the potential impacts associated with implementation of the East Alternative. 10-7
  - Mitigation measure 4.3.3a as presently constructed is too broad, and uses undefined, vague terms such as “other medical facilities.” This mitigation measure would be improved if revised as follows: “In consultation with the California Air Resources Board, implement feasible buffer distances between sensitive uses and sources of substantial pollutant concentrations.” 10-8
  - Mitigation measure 4.2-1 states that “...conserved farmland should be located as close to the Woodland ULL as possible.” This language should be replaced with an objective standard. 10-9
  - Mitigation measure 4.4-4a, beginning at “[i]f the project involves work in areas containing waters disclaimed by USACE...” outpaces state law. This mitigation measure should require compliance with federal and state law, but not expand it. 10-10

Very truly yours,

HEFNER, STARK & MAROIS, LLP



Timothy D. Taron

TDT:CER  
Enclosure  
cc: Paul Navazio

## **EXHIBIT 1**

### **Broadleaf Trading Inc. Agriculture Suitability Analysis for Eastland Ventures, LLC**

(see attached)

## Agriculture Suitability Analysis for Eastland Ventures, LLC.

The objective of this study is to determine the cropping potential of land that is classified as Farmland of Statewide Importance and Unique Farmland under the Important Farmlands Inventory used by the Department of Conservation. Since 2002, Pacific Coast Producers has utilized this land as a spray field for discharged water. For the purpose of this study, all data contained in Section 6 of the 2015 Annual Monitoring and Groundwater Assessment Report will be the sole means of analysis. It is imperative to interpret this data in order to obtain a more comprehensive understanding of agriculture suitability.

### Soil Chemistry Analysis

#### Soil pH Parameters

The pH is the relative measure of soil acidity, with a value of pH 7.0 being neutral. A pH below 7.0 is acidic while a pH above 7.0 is alkaline. Soil pH below 5.5 or exceeding 7.8 can have detrimental effects for the majority of crops. Most crops grow best when soil pH is between 6 and 7.5 because this range maximizes nutrient availability. Phosphorous availability becomes increasing bound or plant-unavailable as the pH drops below 5.5. As the pH increases above 7.5, micronutrients such as iron, manganese, zinc, and copper become unavailable to the plant. Micronutrients are essential for plant growth.

The classification range of soil pH is as follows:

<b>Slightly Alkaline</b>	7.4 - 7.8
<b>Moderately Alkaline</b>	7.9 - 8.4
<b>Strongly Alkaline</b>	8.5 – 9.0
<b>Very strong Alkaline</b>	>9.0

#### Soil pH Analysis

For the soils in question, the average pH of surface and subsurface soils are as follows:

<b>0-1'</b>	8.6
<b>2.5 – 3.5'</b>	8.7
<b>5.5 – 6.5'</b>	8.6

10-11



**The soils in question are classified as strongly alkaline.** This soil condition would cause the availability of essential micronutrients to become virtually unavailable for plant uptake. This results in chlorotic and stunted plants. Often times if alkaline soil conditions exist only in the top 1' of soil, applications of amendments can begin to remedy the problem. However as agronomists, our efforts of amending soil pH below 1' are rendered ineffective due to bulk density constraints.

Electronic Conductivity (EC) Parameters

Electronic Conductivity of the soil indicates the concentration of all soluble salts within the soil. Elevated levels of EC point to high salts in the irrigation water and/or inadequate drainage. The range of ideal EC levels are from 200 – 1,200 umhos/cm. EC levels above 1,200 indicate a salinity problem due to outside contributions of salt and/or inadequate drainage.

Electronic Conductivity (EC) Analysis

The average EC level across each site are high at each depth in the soil profile:

0-1'	2,499
2.5 – 3.5'	2,782
5.5 – 6.5'	2,901

**The EC levels are classified as high and undesirable.** Plant toxicity is likely and nutrient availability is severely diminished at these levels.

Cation Exchange Capacity (CEC) Parameters

Cations are positively charged ions that are attracted to negatively charged soil surfaces. The cations of most importance are Na, Mg, Ca, and K. The CEC or base saturation is the total of these negatively charged sites per volume of soil. In essence, the CEC represents the nutrient holding capacity of the soil. CEC is an important measure of the fertility and potential productivity of a soil. The cations that make up the CEC can be indexed into ratios or percentages in order to determine their balance relative to one another. An unbalance can indicate the likelihood for deficiencies in these nutrients or highlight a problem with secondary nutrient tie up.

10-11  
cont.

The ideal percentages for well-balanced fertile soil are as follows:

<b>Ca:</b>	50 - 80%
<b>Na:</b>	<10%
<b>Mg:</b>	10 - 20%
<b>K:</b>	3 - 7 %

### Cation Exchange Capacity (CEC) Analysis

The CEC or base saturation % at each soil depth sampled is listed below:

<b>0 - 1'</b>	Ca: 36%	Na: 23%	Mg: 25%	K: 16%
<b>2.5 - 3.5'</b>	Ca: 35%	Na: 28%	Mg: 31%	K: 6%
<b>5.5 - 6.5'</b>	Ca: 36%	Na: 34%	Mg: 34%	K: 4%

**The soils in question are not in balance, which will result in limited nutrient availability and poor plant growth.** The low Ca and high Mg levels will reduce water absorption and infiltration. This relationship between Ca and Mg also makes K highly unavailable to the plant. Na levels are significantly beyond the threshold of 10%. The high level of Na will reduce water infiltration, reduce nutrient availability, and can cause plant toxicity.

### Summary of Soil Chemistry Analysis

Proper nutrient balance in the soil profile is necessary for optimal plant growth. An excess in one nutrient can induce a deficiency in another nutrient. For example, the excess Na and Mg in these soils will inhibit K uptake by the plant. The overarching theme to these soils is an alkaline or high soil pH. When one uncovers the underlying components leading to a high pH, there is strong evidence indicating that high sodium levels in the soil are the culprit. EC and CEC components were the two methods utilized in confirming elevated Na levels. High levels of Na cause disintegration of soil aggregates, which reduces large pore space. This makes leaching of salts difficult, since the soil becomes nearly impervious to water. In certain cases sodium can be leached through the soil profile if two factors are present: pure irrigation water, and well-drained soils. If Pacific Coast Producers had the option to begin utilizing a pure water source to leach out salts, it would be difficult to achieve the necessary degree of water

10-11  
cont.

infiltration and subsequent leaching of salts. Beginning in 2005, Pacific Coast Producers moved away from a Na based water source to a Potassium based source. The act of switching away from a Na based water source to a Potassium (K) based water source will not remedy the problem. K is a single charge cation and is less effective at displacing Na from soil particles. The addition of K may prevent the Na problem from worsening, but it will not effectively leach the salts that are already present. The soil chemistry dynamics that exist in these soils will not facilitate the leaching capabilities required to remove salts from the profile.

### Recommendation Based on Soil Chemistry Analysis

The high degree of salts present in these soils makes it nearly impossible to grow a crop that will produce a reasonable economic return. The undesirable soil characteristics negate any attempts of a remediation strategy. A low-value forage crop such as Sudan grass with some known salt tolerances, may be the only crop to have a chance of surviving in these soil conditions. However, although Sudan may tolerate the high salt environment, it will surely not thrive, nor reach full yield potential. Based on the various factors of soil characteristics and economic considerations, it's my view that this property should not be classified as Farmland of Statewide Importance and Unique Farmland under the Important Farmlands Inventory used by the Department of Conservation. Rather, this property should be classified as a non-ag designation, such as commercial or industrial.

Brandon Rebiero  
PCA Lic: #073825  
CCA Lic: #332739

10-11  
cont.

## Disclaimer

*The conclusions and/or recommendations included in this report are based upon the data and information available to Broadleaf Trading, Inc. at the time this report was prepared. As a result, all conclusions and recommendations are time and site specific and are directed to the specific and stated need of the addressed client only. Broadleaf Trading, Inc. assumes no liability for the use of this data or recommendation by another party. While all laboratory analyses are believed to be reliable, they are not guaranteed by Broadleaf Trading, Inc.*

## 2.22 RESPONSE TO COMMENT LETTER #10

**Comment 10-1** The commenter states that the EIR did not rely on certain policies and that the Final EIR should clarify that these policies (Land Use Policies 2.B.1, 2.B.2, 2.L.1, 2.L.5, and 2.L.6, Conservation and Open Space Policy 7.F.6, and Safety Policy 8.B.3) are not intended as mitigation measures. The commenter states that inclusion of these policies as a part of the 2035 General Plan is improper.

Response: The commenter is correct that not every policy serves as a mitigation measure in the EIR. However, the policies are a part of the Proposed Project, and the Draft EIR analyzed the Project in its entirety in reliance on the policies. If the City changes or removes any of the policies from the Draft 2035 General Plan (in particular any policy related to the timing or location of growth), the City would be required under CEQA to determine whether the environmental analysis is sufficient for the changed project and whether the EIR would be required to be revised and recirculated for additional public comment and review.

**Comment 10-2** The commenter has identified typographical errors related to farmland acreage.

Response: See the response to comment 05-8.

**Comment 10-3** The commenter states that the farmland within SP-2 is incorrectly classified as being primarily comprised of Farmland of Statewide Importance and Unique Farmland and that these classifications in the EIR ignores the high degree of salts present in the SP-2 soils. The commenter recommends that the SP-2 property be classified instead as Other Land, which the commenter indicates would afford a more accurate basis for comparison of the alternatives. The commenter provides an exhibit that appears to be a soils analysis prepared by Broadleaf Trading, Inc. and that purports to support the commenter's conclusion.

Response: The information provided by the commenter is a part of the administrative record for consideration by decision makers. However, for purposes of CEQA, the City does not consider the exhibit substantial evidence. The report provided by the commenter does not identify the expertise or credentials of either the firm or individual(s) who prepared it and does not specifically identify the specific data reviewed or methodology employed to review the data. The report says that the sole means of analysis is "Section 6 of the 2015 Annual Monitoring and Groundwater Assessment Report," but does not state who prepared that report or where it is available for review. It does not appear that the author or the firm analyzed the soil itself but instead relied upon one report to reach its conclusions. If this information is provided at a subsequent time, it may become a part of the record and may be considered by the decision makers in their deliberations. Should this occur, CEQA Guidelines Section 15151 may apply; however it would not change the substance of this response.

Because the Draft EIR uses appropriate methodology for characterizing potential impacts, the City declines to revise the soil classifications for either the SP-2 soils or any other soils in the Planning Area. The EIR relies on the farmland classifications of the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP), which are based on soil

quality and irrigation status, for the entirety of the Planning Area. Use of the FMMP maps is consistent with the significance criteria set forth in Appendix G of the CEQA Guidelines, which defines the conversion of farmland based on the FMMP maps. CEQA Guidelines Appendix G checklist item “a)” under “Agriculture and Forestry Resources,” reads:

“Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?”

The goal of the FMMP, according to the Department of Conservation is “to provide consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California’s agricultural land resources” (Department of Conservation 2017). Similar to the Department of Conservation’s goal for the FMMP program, the City has used these data to consistently evaluate potential agricultural impacts associated with the Proposed Project throughout the entire Planning Area. Thus, because the commenter has not provided substantial evidence to rebut the EIR’s data or conclusions, and more importantly, to maintain both consistency in, and integrity of, the soil classifications throughout the EIR, and to comply with the significance standard in Appendix G of the CEQA Guidelines, the City declines to change the soil classification for lands in SP-2 or any other lands in the Planning Area. As with any topic, if there is more specific information related to a property at the time a future project is proposed, the City may elect to take into account such site-specific information in planning and environmental review.

**Comment 10-4** The commenter states that the habitat values of SP-2 are erroneously described, that the Draft EIR describes SP-2 as supporting 182 acres of cultivated rice fields, but that in the alternatives chapter, the Draft EIR concludes that development would convert approximately 472 acres of cultivated rice fields. The commenter states that as a result of the errors, the Draft EIR does not provide a proper basis for comparison of biological resource impacts between the East and South Alternatives.

Response: The acreage numbers provided in Chapter 4 of the Draft EIR are correct and were inadvertently incorrectly transcribed in Chapter 5 of the Draft EIR. The City appreciates the careful review of the acreage numbers by the commenter and is accordingly changing the numbers in Chapter 5 to reflect the same numbers as presented in Chapter 4. After reviewing both the biological resources analysis and the alternatives analysis, the environmental significance conclusions do not require change, and no additional changes to the text of the EIR are being made other than to correct the incorrect numbers presented in Chapter 5.

The text on page 5-34 in Chapter 5.0 “Alternatives” of the Draft EIR has been revised accordingly to read as follows:

“The Proposed Project designates ~~617~~ 873 acres of Open Space and 521 acres of Flood Study Area that currently consist of annual grasslands, alkali prairie, freshwater wetlands, open water, and existing parks and habitat preserves.”

Additionally, the text of page 5-35 in Chapter 5.0, “Alternatives,” of the Draft EIR has been revised accordingly:

“Conversely, implementing the East Alternative would allow conversion of approximately ~~472~~ 182 acres of cultivated rice fields that provide suitable habitat for giant garter snake in SP-2.”

**Comment 10-5** The commenter raises three separate points in this comment related to the environmentally superior alternative. First, the commenter writes that the most significant difference between the East and South Alternative is the impact on prime agricultural land, but that the discussion of the environmentally superior alternative in the Draft EIR “ignores this issue altogether.” Second, the commenter states that Section 5.7 summarily concludes that the South Alternative would have fewer impacts compared to the East Alternative for a variety of impacts and that the determinations for agricultural and biological resources in particular are based on incorrect information. Third, the commenter appears to state that while the EIR concludes that the impacts associated with the South Alternative are slightly less because slightly more non-residential square footage was assigned to the East Alternative, that conclusion is incorrect. The commenter concludes the comment by stating that the environmentally superior alternative lacks meaningful analysis and reaches an incorrect conclusion.

Response: As an initial response, this comment advocates for a different conclusion for the environmentally superior alternative. However, the commenter has not provided evidence or analysis in support of a change in the finding related to the environmentally superior alternative. As to the first point raised by the commenter, the EIR in Section 4.2 analyzes the impact to prime agricultural land under both the East and South Alternatives. Section 4.2-1 of the EIR concludes that the conversion of prime agricultural land under either alternative would be a significant and unavoidable impact after mitigation and application of applicable proposed General Plan policies. The commenter’s statement that the most significant difference between the two alternatives is their respective impact on prime agricultural land is a subjective statement that is not based on any evidence provided by the commenter or any other information in the record.

Second, the analysis concerning agricultural impacts and the classification of soils was consistently based on the FMMP, as explained in response to comment 10-3. The farmland acreage numbers have been corrected, as explained in response to comment 10-2. Additionally, the acreage numbers in the biological resources analysis were correct, and appropriate text changes are being made in the Final EIR to reflect the correct numbers in Chapter 5, as stated in response to comment 10-4.

The commenter’s other comment regarding section 5.7 was that the EIR summarily concludes that the South Alternative would have fewer impacts than the East Alternative. The commenter, however, has not provided information that would support a different conclusion. It appears that the commenter merely disagrees with the conclusion. A further discussion of the alternatives analysis is set forth below. Chapter 5 of the Draft EIR presented a detailed

and comprehensive assessment of the relative impacts associated with the alternatives. Please refer to Section 5.5, which starts on page 5-23 of the Draft EIR.

Third, the commenter appears to state that while the Draft EIR concludes that the impacts associated with the South Alternative are slightly less because slightly more non-residential square footage was assigned to the East Alternative, that conclusion is incorrect. The commenter states that the discussion of the environmentally superior alternative lacks meaningful analysis and reaches an incorrect conclusion. It appears that the commenter is advocating for the East Alternative to be considered the environmentally superior alternative.

Chapter 5 of the EIR evaluates the environmentally superior alternative, as required by CEQA, and concludes that the No Project Alternative is environmentally superior. CEQA requires that another alternative be chosen as the environmentally superior alternative when the no project alternative is the environmentally superior alternative. Chapter 5 of the Draft EIR presented an assessment of the relative impacts associated with the alternatives for each relevant environmental issue. Chapter 5 also provides a comparison table (Table 5-24) of the three different alternatives (No Project, South, and East) and sets forth their relative environmental superiority compared against each other with either an equals sign or a greater than or less than sign. That table showed that the East Alternative had fewer environmental impacts than the South Alternative in the area of agriculture, similar environmental impacts in six environmental impact areas, and greater environmental impacts in seven areas. Topics where the environmental impact was considered equal included aesthetics, climate change, hazards, noise and vibration, public services, transportation, and utilities. Topics where the environmental impact was considered to be greater for the East Alternative than the South Alternative included air quality; biological resources; cultural resources; geology and soils; hydrology and water quality; and land use, population, and housing. Topics where the environmental impact was considered to be greater for the South Alternative than the East Alternative included agriculture. The EIR also provided an explanation regarding why the South Alternative was determined to be environmentally superior over the East Alternative. Page 5-64 of the EIR explains that the South Alternative would disturb less land than the East Alternative, which would result in fewer emissions, less habitat loss, less potential to encounter archaeological and historic architectural resources that could be damaged or destroyed, and less risk of flooding. Additionally, while the degree to which the South Alternative might be environmentally superior over the East Alternative may not be large in some impact areas, the environmentally superior analysis is not one of degree but of totality of weighing the two different alternatives against each other and determining which one is environmentally superior.

**Comment 10-6**

The commenter quotes text from page 4.4-29 stating that within the Flood Study Area, residential, commercial, and industrial uses are not allowed under the action alternatives. The commenter states that the language is “inconsistent with representations that have been made to date, namely, that if a flood study area is deemed unnecessary for flood control infrastructure, said area will be added to the adjacent specific plan areas.” The commenter urges the City to remove the quoted language from the Final EIR and instead examine the potential impacts of future development in the Flood Study Areas adjacent to SP-2 and SP-3.

Response: This comment raises issues concerning growth within the Flood Study Area and statements purportedly made by the City regarding specific plan areas. The comment does not raise an issue regarding the sufficiency of the Draft EIR or raise a specific environmental effect; nor does the commenter point to a specific policy that would justify the requested change. The Draft EIR addresses potential effects associated with the Proposed Project, as detailed in Chapter 3 of the Draft EIR, “Project Description.” The commenter primarily raises an issue of General Plan implementation, which will occur when and if development uses are assigned to a specific plan area. As such, no change to the EIR is warranted.

Please refer also to the response to comment 09-1.

**Comment 10-7** The commenter states that the Draft EIR ignores the feasibility of extending the City’s recycled water program to serve SP-2 and does not consider that SP-2 is within the place of use for Conaway Preservation Group’s (CPG’s) surface water rights. The commenter asserts that these omissions distort the potential impacts associated with implementation of the East Alternative. However, the commenter does not describe the distortion or explain how the environmental analysis would have differed had this information been included in the Draft EIR.

Response: The City has sufficient recycled water capacity to potentially serve SP-2. If implemented, recycled water would be used for large landscape irrigation and perhaps cooling for large buildings. The City at this time does not plan to make recycled water available for any residential landscaping use. However, extension of recycled water would depend on whether there would be sufficient use to justify the extension.

If and when SP-2 develops, the area would have City of Woodland potable water, and recycled water would likely be available for the uses described above. The SP-2 lands are included in the City’s water right service area. Additionally, it would not be feasible to construct a water treatment facility to use CPG water to supply the area or a pump station to provide irrigation water.

**Comment 10-8** The commenter states that Mitigation Measure 4.3-3a concerning protection of sensitive receptors from potential toxic air contaminant impacts is too broad and uses undefined, vague terms. Specifically, the commenter complains that terms such as “other medical facilities” is a broad, undefined, and vague term. The commenter suggests that the mitigation measure would be improved if, instead, the first two sentences of the policy were deleted and the third sentence was slightly modified.

Response: The City declines to make the requested change and finds that the specificity set forth in the mitigation measure provides useful guidance and clarity for the City.

**Comment 10-9** The commenter provides an opinion that Mitigation Measure 4.2-1, which requires that conserved farmland be located as close to the Woodland ULL as possible, is too subjective and that an objective standard should be used instead. The commenter provides no alternative language that would make this standard more objective and less subjective.

Response: The City finds that the term “as close to the Woodland ULL as possible” is an objective standard.

**Comment 10-10** The commenter states that a phrase in Mitigation Measure 4.4-4a concerning requiring project applicants to obtain a waste discharge requirement permit from the Regional Water Quality Control Board if a project involves work in areas containing waters disclaimed by the U.S. Army Corps of Engineers outpaces State law and should require compliance with federal and State law, but not expand it.

Response: Mitigation Measure 4.4-4a does not expand federal or State laws. Rather, Mitigation Measure 4.4-4a presents an implementation program that requires compliance with current federal and State laws to ensure no net loss of functions and values of affected wetlands and waters. After the quote provided in the comment, the mitigation goes on to say that if the project involves waters disclaimed (determined not to be jurisdictional under federal regulations) by the USCACE, State Porter-Cologne Act compliance would be required. No change to the EIR has been made.

**Comment 10-11** Exhibit 1 to the comment letter is an Agriculture Suitability Analysis for Eastland Ventures, LLC, the stated purpose of which was to determine the cropping potential of land that is classified as Farmland of Statewide Importance and Unique Farmland under the Important Farmlands Inventory used by the California Department of Conservation. The analysis concludes that the soil has a high degree of salts and that the property should be given a non-agricultural designation.

Response: As stated above in response to comment 10-3, the City relied on farmland classifications of the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP). The City has, however, included Exhibit 1 as a part of this Final EIR so that decision makers may review its content. The City has determined that the exhibit does not provide substantial evidence to warrant reexamining the statewide standard or maps used in the agricultural impact analysis. The commenter provides no information regarding the expertise or credentials of the individual who prepared the report, no information regarding the firm whose letterhead the report appears on, and no specific information regarding the methodology used to conduct the purported analysis. Rather, it appears that the report’s author reviewed an unspecified document (with an unclear title and no reference as to its availability online or otherwise) and used this document as “the sole means of analysis.” It does not appear that the report’s author collected soil from the land used by PCP or independently verify, or attempt to independently verify the conclusions reached in the unspecified document. Because the commenter believes that the State’s FMMP data is inaccurate and/or outdated, the commenter may wish to forward the analysis and request for a change in classification to the California Department of Conservation for appropriate analysis and potential adjustment.

FMMP data is updated by the Department of Conservation, since conditions can change that affect farmland classifications. The Draft EIR was initiated in 2013 and used the most updated data, which was prepared in 2012. Since then, 2014 data has been released. The 2014

data shows the same acreages for Important Farmlands in SP-2 as was included in the 2012 Department of Conservation data (Department of Conservation 2017). As with any topic, if there is more specific information related to a property at the time a future project is proposed, the City may elect to take into account such site-specific information in planning and environmental review.

## 2.23 COMMENT LETTER #11

11

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 3 – SACRAMENTO AREA OFFICE  
2379 GATEWAY OAKS DRIVE, STE 150 – MS 19  
SACRAMENTO, CA 95833  
PHONE (916) 274-0635  
FAX (916) 263-1796  
TTY 711



*Serious drought.  
Help save water!*

November 3, 2016

03-YOL-2016-00014  
SCH #2013032015

Ms. Cindy Norris  
Woodland City Community Development Department  
300 First Street  
Woodland, CA, 95695

### **Woodland General Plan Update (all elements) and Climate Action Plan – Draft Environmental Impact Report (DEIR)**

Dear Ms. Cindy Norris:

Thank you for including the California Department of Transportation (Caltrans) in the application review process for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

11-1

The General Plan update has two alternatives with a cap of about 7,000 on new residential units and 17 million square feet of new non-residential development. The City of Woodland is concurrently creating its first Climate Action Plan (CAP). The following comments are based on the DEIR.

#### ***Vehicle Miles Traveled (VMT)***

This Plan, as implemented, has the potential to dramatically increase VMT on the State Highway System (SHS). We anticipate new development to generate thousands of trips per peak hour on nearby State Route (SR) 113 and Interstate 5 (I-5).

The DEIR for the General Plan update and CAP identify ways to reduce VMT impacts on the SHS. We recognize and commend the City of Woodland for potentially being one of the first cities in the State to set their own VMT threshold for new developments.

11-2

Specifically, we support General Plan Policy 3.A.4 as amended as a part of mitigation measure 4.13-1c on page 4.13-18.

*"Provide a safe, sustainable, integrated, and efficient, transportation system to enhance California's economy and livability"*

We also commend Implementation Program 3.8 which states that after the final adoption of Senate Bill 743 CEQA Guidelines changes and any associated technical advisory recommendations by the State of California, the City will assess the VMT reduction goal contained in Policy 3.A.4. We encourage the city to set a more stringent threshold if determined to be the final recommendation by the Governor’s Office of Planning and Research (OPR).

11-3

Caltrans supports a VMT reduction threshold more stringent than 10%, which is consistent with OPR’s current technical advisory. We do note, however, that the Lead Agency has full discretion to set its own significance thresholds. As identified by Table 4.13-6 of the EIR, the East Alternative would have 33.6 VMT per capita, and the South Alternative would have 33.2 VMT per capita. Both alternatives have VMT rates higher than the existing 32.7 VMT per capita for the City. The City has nearly double the VMT per capita compared to the Sacramento Area Council of Governments (SACOG) regional average of 16.8. We anticipate many of the City’s residents will need to commute to employment centers in Davis and Sacramento, resulting in the high rate of VMT per capita. One potential strategy to reduce VMT is to provide additional public transit service from Woodland to Davis and Sacramento.

11-4

We do recognize and support the strategies in the 2035 CAP which seek to engage the community in efforts to reduce VMT including setting specific goals for participation, identifying and promoting programs and rewarding positive results. Some examples include encouraging telecommuting and carpooling.

11-5

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Jacob Buffenbarger, Intergovernmental Review Coordinator at (916) 263-1625 or by email at: [Jacob.Buffenbarger@dot.ca.gov](mailto:Jacob.Buffenbarger@dot.ca.gov).

Sincerely,



ERIC FREDERICKS, Chief  
Office of Transportation Planning – South Branch

*“Provide a safe, sustainable, integrated, and efficient, transportation system to enhance California’s economy and livability”*

## 2.24 RESPONSE TO COMMENT LETTER #11

**Comment 11-1** The commenter describes the Proposed Project and provides general introductory comments that do not require further response.

Response: This comment does not relate to the adequacy of the Draft EIR in addressing potential environmental effects associated with the Proposed Project. No response is required.

**Comment 11-2** The commenter describes the Proposed Project and the potential project VMT impact on the State Highway System and commends the City for its approach to addressing this impact, which is disclosed under Impact 4.13-2 of the Draft EIR. The commenter specifically supports General Plan Policy 3.A.4 as amended as a part of mitigation measure 4.13-1c.

Response: This comment does not relate to the adequacy of the Draft EIR in addressing potential environmental effects associated with the Proposed Project. No response is required.

**Comment 11-3** The commenter commends the City for its mitigation approach to addressing Impact 4.13-2 and encourages the City to consider a more stringent VMT reduction threshold depending on the final OPR implementation guidance for SB 743.

Response: The City will reconsider its VMT reduction goals as described in Mitigation Measure 4.13-1c, which includes Implementation Program 3.8 requiring the City to assess the VMT reduction goal contained in Policy 3.A.4 once the State of California adopts final CEQA guidance for SB 743.

**Comment 11-4** The commenter expresses support for a more stringent VMT reduction threshold than 10 percent but notes that lead agencies have discretion on setting this threshold. The commenter also notes that the VMT per capita for both alternatives is higher than the existing VMT per capita for the City and as compared to the Sacramento Area Council of Governments regional average. The commenter anticipates that many City residents will commute to their jobs, which would result in the high rate of VMT per capita and that one strategy to reduce VMT is to provide additional public transit service.

Response: This comment does not relate to the adequacy of the Draft EIR for addressing potential impact associated with the Proposed Project.

The City agrees with the commenter that lead agencies have discretion to exercise judgement in relation to VMT policies. The current VMT reduction goal considered the OPR recommended VMT threshold for residential and office projects contained in the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA Implementing Senate Bill 743 (Steinberg, 2013)*, January 20, 2016, OPR. The 'draft' guidance from OPR recommends a per-capita VMT threshold of 15 percent below the existing (baseline) citywide or regional value depending on the specific land use. One justification for this particular threshold was based on analysis contained in *Quantifying Greenhouse Gas Mitigation Measures*, California Air Pollution Control Officers Association (CAPCOA), 2010 that indicates a 15 reduction in VMT per capita is achievable in suburban

areas. This reduction is the ‘maximum’ feasible reduction in a suburban area and the CAPCOA document acknowledges that limited empirical evidence exists to support this value. The document also explains that achieving maximum reductions in suburban areas requires projects to include a diverse land use mix, workforce housing, and project-specific transit. This will not always be possible for all future land use projects in Woodland, especially in the City’s industrial area or when a project only includes a single land use. The 10 percent reduction goal as recommended in Mitigation 4.13-2 considers the local land use and transportation context in Woodland.

As to the differences in Woodland and SACOG VMT per capita estimates, a direct comparison is not appropriate. The Woodland VMT per capita estimates in Table 4.13-6 of the Draft EIR (as documented in footnote 1 to the table) includes travel from *all* vehicles based on an allocation of VMT that includes 100 percent responsibility for all trips with both trips ends in the City of Woodland and 50 percent responsibility for trips with only one trip in the City. The estimate of a regional average of 16.8 VMT per capita is similar to the household generated VMT per capita for the region contained in Table 16.10 of the *SACOG MTP/SCS 2016 Draft Environmental Impact Report*. If the cited figure is in fact from the MTP/SCS, this would only represents a portion of total VMT for the region excluding commercial and external trips that are included in the Woodland estimate in Table 4.13-6. The estimate presented for the General Plan alternatives includes not just household-generated VMT, but all VMT, so it is not unexpected that it would be higher than a VMT estimate that includes household generated VMT only.

The City will consider expanded transit service in coordination with Yolo County Transportation District (YCTD) as a potential VMT reduction strategy as part of new development review and citywide planning efforts. The specific service expansion and timing will be subject to implementation feasibility and cost effectiveness.

**Comment 11-5** The commenter supports the strategies in the 2035 CAP, including encouraging telecommuting and carpooling, and does not pose any questions about the impact analysis requiring further response.

Response: No response is required.

## 2.25 COMMENT LETTER #12

12



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

November 3, 2016

Cindy Norris  
City of Woodland, Comm. Dev. Dept.  
300 First Street  
Woodland, CA 95695

Subject: City of Woodland General Plan Update and Updated Climate Action Plan  
SCH#: 2013032015

Dear Cindy Norris:

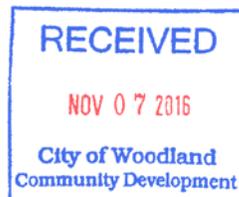
The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on November 2, 2016, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

12-1



1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2013032015  
**Project Title** City of Woodland General Plan Update and Updated Climate Action Plan  
**Lead Agency** Woodland, City of

**Type** EIR Draft EIR  
**Description** General Plan Update (all elements) and Climate Action Plan.

**Lead Agency Contact**

**Name** Cindy Norris  
**Agency** City of Woodland, Comm. Dev. Dept.  
**Phone** 530 661-5911 **Fax**  
**email**  
**Address** 300 First Street  
**City** Woodland **State** CA **Zip** 95695

**Project Location**

**County** Yolo  
**City** Woodland  
**Region**  
**Lat / Long**  
**Cross Streets**  
**Parcel No.** Entire City  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** Hwy 5, 6, 113  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use** Various

**Project Issues** Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 2; Department of Parks and Recreation; Cal Fire; Department of Water Resources; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 3 S; Regional Water Quality Control Bd., Region 5 (Sacramento); California Energy Commission; Native American Heritage Commission; Public Utilities Commission; Delta Stewardship Council

**Date Received** 09/19/2016 **Start of Review** 09/19/2016 **End of Review** 11/02/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.

## 2.26 RESPONSE TO COMMENT LETTER #12

**Comment 12-1** The commenter states that the State Clearinghouse submitted the Draft EIR to State agencies for review. The commenter states that no comments were received by the close date of the review period.

Response: The City notes the comment. No further response is necessary.

## 2.27 COMMENT LETTER #13



EDMUND G. BROWN JR.  
GOVERNOR

November 4, 2016

Cindy Norris  
City of Woodland, Comm. Dev. Dept.  
300 First Street  
Woodland, CA 95695

Subject: City of Woodland General Plan Update and Updated Climate Action Plan  
SCH#: 2013032015

Dear Cindy Norris:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on November 2, 2016. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2013032015) when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

13



KEN ALEX  
DIRECTOR

13-1

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov



**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 3 – SACRAMENTO AREA OFFICE  
2379 GATEWAY OAKS DRIVE, STE 150 – MS 19  
SACRAMENTO, CA 95833  
PHONE (916) 274-0635  
FAX (916) 263-1796  
TTY 711

late  
11/2/16  
E



*Serious drought.  
Help save water!*

Governor's Office of Planning & Research

NOV 03 2016

STATE CLEARINGHOUSE

03-YOL-2016-00014  
SCH #2013032015

November 3, 2016

Ms. Cindy Norris  
Woodland City Community Development Department  
300 First Street  
Woodland, CA, 95695

**Woodland General Plan Update (all elements) and Climate Action Plan – Draft Environmental Impact Report (DEIR)**

Dear Ms. Cindy Norris:

Thank you for including the California Department of Transportation (Caltrans) in the application review process for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

The General Plan update has two alternatives with a cap of about 7,000 on new residential units and 17 million square feet of new non-residential development. The City of Woodland is concurrently creating its first Climate Action Plan (CAP). The following comments are based on the DEIR.

***Vehicle Miles Traveled (VMT)***

This Plan, as implemented, has the potential to dramatically increase VMT on the State Highway System (SHS). We anticipate new development to generate thousands of trips per peak hour on nearby State Route (SR) 113 and Interstate 5 (I-5).

The DEIR for the General Plan update and CAP identify ways to reduce VMT impacts on the SHS. We recognize and commend the City of Woodland for potentially being one of the first cities in the State to set their own VMT threshold for new developments.

Specifically, we support General Plan Policy 3.A.4 as amended as a part of mitigation measure 4.13-1c on page 4.13-18.

13-2

*"Provide a safe, sustainable, integrated, and efficient, transportation system to enhance California's economy and livability."*

We also commend Implementation Program 3.8 which states that after the final adoption of Senate Bill 743 CEQA Guidelines changes and any associated technical advisory recommendations by the State of California, the City will assess the VMT reduction goal contained in Policy 3.A.4. We encourage the city to set a more stringent threshold if determined to be the final recommendation by the Governor's Office of Planning and Research (OPR).

Caltrans supports a VMT reduction threshold more stringent than 10%, which is consistent with OPR's current technical advisory. We do note, however, that the Lead Agency has full discretion to set its own significance thresholds. As identified by Table 4.13-6 of the EIR, the East Alternative would have 33.6 VMT per capita, and the South Alternative would have 33.2 VMT per capita. Both alternatives have VMT rates higher than the existing 32.7 VMT per capita for the City. The City has nearly double the VMT per capita compared to the Sacramento Area Council of Governments (SACOG) regional average of 16.8. We anticipate many of the City's residents will need to commute to employment centers in Davis and Sacramento, resulting in the high rate of VMT per capita. One potential strategy to reduce VMT is to provide additional public transit service from Woodland to Davis and Sacramento.

We do recognize and support the strategies in the 2035 CAP which seek to engage the community in efforts to reduce VMT including setting specific goals for participation, identifying and promoting programs and rewarding positive results. Some examples include encouraging telecommuting and carpooling.

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Jacob Buffenbarger, Intergovernmental Review Coordinator at (916) 263-1625 or by email at: [Jacob.Buffenbarger@dot.ca.gov](mailto:Jacob.Buffenbarger@dot.ca.gov).

Sincerely,



ERIC FREDERICKS, Chief  
Office of Transportation Planning – South Branch

*"Provide a safe, sustainable, integrated, and efficient, transportation system to enhance California's economy and livability"*

13-2  
cont.

## 2.28 RESPONSE TO COMMENT LETTER #13

**Comment 13-1** The commenter states that the State Clearinghouse received comments after the end of the review period. The commenter states that lead agencies are not required to respond to late comments, however they can provide information or raise issues that should be addressed.

Response: The City notes this comment. No further response is necessary.

**Comment 13-2** The attached letter is a copy of comment Letter 11.

Response: See responses to comment Letter 11, above.

### REFERENCES

California Department of Conservation. Farmland Mapping and Monitoring Program Overview. Available: <http://www.conservation.ca.gov/dlrp/fmmp/overview/Pages/index.aspx>. Accessed January 20, 2017.

Yolo-Solano Air Quality Management District (YSAQMD). 2007. Handbook For Assessing and Mitigating Air Quality Impacts. Available: <http://www.ysaqmd.org/documents/CEQAHandbook2007.pdf>. Accessed January 20, 2017.

## 3 REVISIONS TO THE DRAFT EIR

This section contains changes to the text of the Draft EIR and General Plan. The changes are presented in the order in which they appear and are identified by page number. Text deletions are shown in ~~strikeout~~ and additions are shown in underline.

### 3.1 TABLE OF CONTENTS

#### 3.1.1 PAGE IV REVISIONS:

The heading title for Section 4.2.3 has been revised to read, “4.2.3 Regulatory ~~Setting~~Framework”

### 3.2 EXECUTIVE SUMMARY

#### 3.2.1 PAGE 2-1 REVISIONS:

The second paragraph under Section 2.2.1 “Purpose,” has been revised to read, “The purpose of an EIR is neither to recommend approval nor denial of a project but rather to provide substantial evidence to support such a decision.”

#### 3.2.2 PAGE 2-8 REVISIONS:

Adding some text for clarity in the second paragraph:

Adoption and implementation of the Proposed Project will include (but not be ~~not~~ limited to) the following actions by the City of Woodland:

Under the third bullet, correcting a typo:

- ▶ Direct staff to petition the Yolo Local Agency Formation Commission to amend the Woodland Sphere of ~~Influent~~ Influence to reflect the voter approved Urban Limit Line and the 2035 General Plan

#### 3.2.3 PAGE 2-9 REVISIONS:

In the last paragraph under Section 2.8, Areas of Controversy and Issues to Be Resolved,” a very minor revision has been made for clarity:

All of these issues have been addressed within various sections of the 2035 this EIR. In addition Chapter 4 (Environmental Impact Analysis) addresses mitigation for significant effects and 5 (Alternatives) addresses choices to be made by the City among alternatives. Other areas of controversy and/or issues to be resolved may emerge during the course of the public review and decision-making process.

The first paragraph under Section 2.9 “Summary of Environmental Impact and Mitigation Measures,” has been revised to read: “Information in Table 2-1, “Summary of Environmental Impacts and Mitigation Measures,” has been organized to correspond with the environmental issues discussed in ~~Section~~ Chapter 4 of this EIR.”

The second paragraph under Section 2.9 “Summary of Environmental Impact and Mitigation Measures,” has been revised to read: “...Cumulative impacts are described in detail in ~~Section~~ Chapter 6 of this EIR, “Other CEQA Considerations...”

### 3.2.4 PAGE 2-11 REVISIONS:

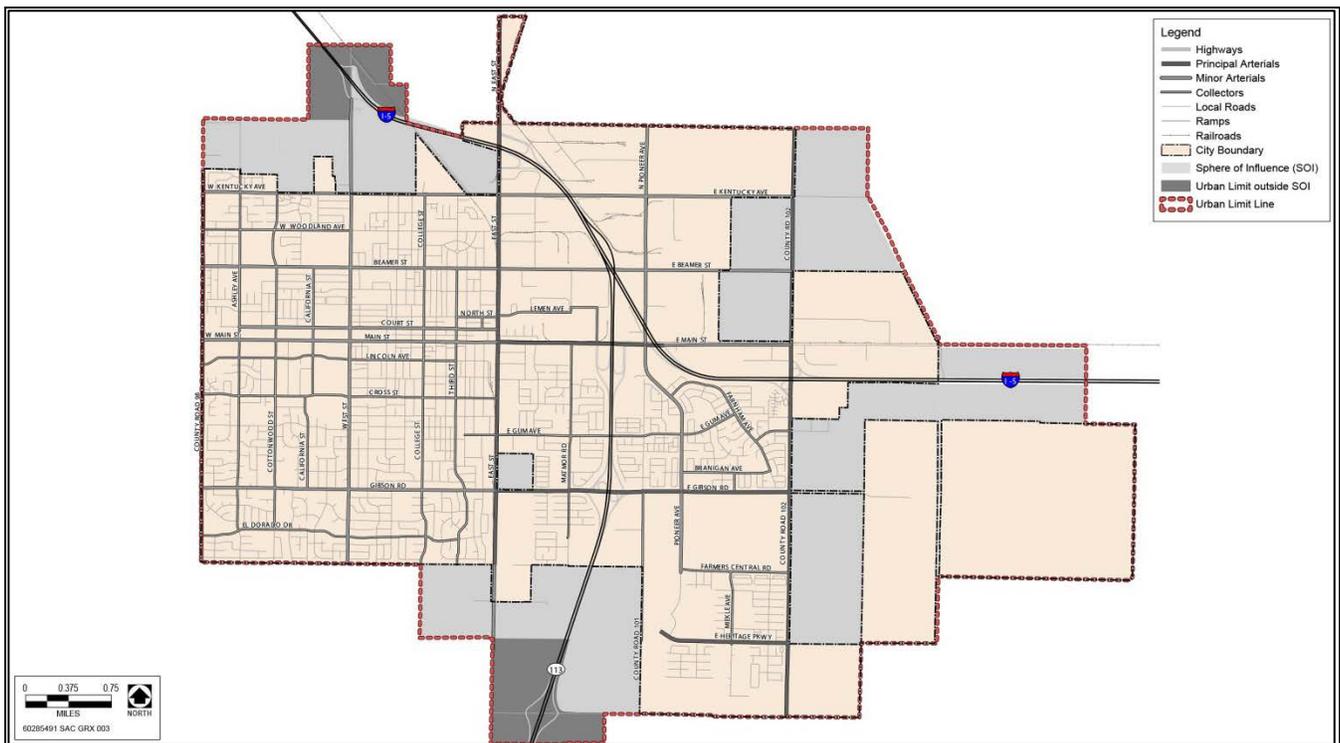
Mitigation Measure 4.2.-3 is revised as follows:

Policy 7.C.5 Agricultural Buffer. Require new development that occurs at the edge of the ULL to be set back a minimum of 300 feet from adjacent agricultural land where possible. ~~Exceptions and alternative~~ Equivalent means of providing agricultural buffers may be considered by the Planning Commission on a case by case basis for parcels where development potential would be precluded or severely limited as a result of the required buffer size. The buffer shall be landscaped/vegetated and may include public right of way.

## 3.3 CHAPTER 3, “PROJECT DESCRIPTION”

### 3.3.1 PAGE 3-4 REVISIONS:

Exhibit 3.2-2 has been revised to remove the distinctions between the 10-year and 20-year spheres of influence in both the map and legend.



(Revised) Exhibit 3.2-2.

Existing Planning Boundaries

### 3.3.2 PAGE 3-5 REVISIONS:

Section 3.2.1.1 “Sphere of Influence,” has been revised as follows:

Contained within the Planning Area and project site is Woodland’s Sphere of Influence (SOI). The SOI is a boundary that encompasses lands that are expected to ultimately be annexed by the City. Yolo County Local Agency Formation Commission (LAFCo), an entity empowered to review and approve proposed boundary changes and annexations by incorporated municipalities, determines the SOI. ~~For Yolo County communities, the SOI is divided into a 10-year boundary and a 20-year boundary, based on LAFCo’s determination of when the land would need to be annexed to accommodate growth.~~ Although LAFCo does not have land use authority, the SOI is intended to guide urban land uses into an efficient development pattern, with consideration given to preserving prime farmland and other open space lands. LAFCo must also consider consistency with a city’s general plan and any specific plans.

Upon adoption of the 2035 General Plan, the City will petition the Yolo Local Agency Formation Commission (LAFCo) to amend the Woodland Sphere of Influence (SOI) to reflect the voter approved Urban Limit Line and the 2035 General Plan. This EIR comprehensively addresses potential impacts associated with the Proposed Project, including any changes to the City’s SOI that would be required in advance of development outside the City’s existing SOI. ~~provides CEQA coverage for that SOI amendment.~~

### 3.3.3 PAGE 3-20 REVISIONS:

The fourth paragraph of Section 3.7.1.1 “East Alternative,” has been revised as follows:

According to the 2035 General Plan, development in the new growth areas is expected to occur in phases, as shown in Table 3.7-5. Development of SP-1A is anticipated to occur first, likely between 2016 and 2025. Development of SP-2 and residential development in SP-3A is expected to occur later, though the exact timing is uncertain as Specific Plans for these areas may not be approved until a comprehensive flood solution and supporting funding have been secured (see 2035 General Plan Policy 2.B.2). Development of SP-3B and the Southern Gateway business park in SP-1B can proceed at any time. Development of the remainder of SP-1B and SP-1C is not permitted prior to 2035 without a comprehensive General Plan Update and accompanying EIR.

### 3.3.4 PAGE 3-21 REVISIONS:

The fourth paragraph of Section 3.7.1.2 “South Alternative,” has been revised as follows:

According to the 2035 General Plan, development in the new growth areas is expected to occur in phases, as shown in Table 3.7-5. Development of SP-1A is anticipated to occur first, likely between 2016 and 2025. Development of SP-1B and SP-1C is expected to follow, approximately between 2026 and 2035. The exact timing for the development of SP-3A is uncertain as a Specific Plan for this area may not be approved until a comprehensive flood solution and supporting funding have been secured (see 2035 General Plan Policy 2.B.2). Development of SP-3B and the Southern Gateway business park in SP-1B can proceed at any time. Development of

SP-2 is not permitted prior to 2035 without a comprehensive General Plan Update and accompanying EIR, and is not planned to occur before 2035 under the South Alternative.

### **3.3.5 PAGE 3-50 REVISIONS:**

The last paragraph of Section 3.9 “Adoption and Implementation,” has been revised as follows:

Following adoption of the 2035 General Plan, the City will begin the process of updating active specific plans, master plans, and other implementation documents to be consistent with the new plan, and reflect the adopted policy language, and design and development guidance. This will include repeal of the East Street Corridor Specific Plan, because the City has deemed that the 2035 General Plan will better meet the community’s goals for the East Street Corridor than the Specific Plan that was adopted in 1998.

### **3.3.6 PAGE 3-51 REVISIONS:**

The first paragraph of Section 3.10 “Agencies Expected to use this EIR,” has been revised as follows:

A number of other jurisdictional and permit-granting agencies have ~~control over specific environmental concerns in the City~~ jurisdiction over activities that could occur within the City’s Planning Area during implementation of the Proposed Project. The following is a listing of agencies that may utilize this EIR.

### **3.3.7 PAGE 3-52 REVISIONS:**

Section 3.11 “Relationship to Other Plans and Regulations,” has been revised as follows:

The 2035 General Plan and this accompanying General Plan EIR both make reference to laws, plans, and regulations administered by other public agencies. In many instances, the City’s policies are specifically designed to achieve consistency with regulations of another public agency. In other cases, the City commits to seeking input from other agencies on issues that may arise over the course of implementing the 2035 General Plan. Unless otherwise specified, any reference to “consulting with” or “coordinating with” other agencies in no way delegates, transfers, or assigns the City’s responsibility for land use entitlement or lead agency responsibilities for managing land use change. Some of the key areas of interaction with other agencies are described below.

## **3.4 CHAPTER 4, “ENVIRONMENTAL IMPACT ANALYSIS”**

### **3.4.1 PAGE 4.0-2 REVISIONS:**

Section 4.0.2.1 “Environmental Setting,” has been revised as follows:

This subsection provides relevant information about the existing physical environment related to the particular environmental topic. In accordance with Section 15125 of the CEQA Guidelines, the discussion of the physical environment describes existing conditions within the City at the time the NOP was filed (2013)—unless otherwise noted.

### 3.5 CHAPTER 4.2, “AGRICULTURE AND FORESTRY RESOURCES”

#### 3.5.1 PAGE 4.2-8 REVISIONS:

The first sentence of the first paragraph under Section 4.2.2.5 “Williamson Act Land in the Planning Area,” has been revised as follows:

The Williamson Act, explained further in Section 4.2.23, Regulatory Framework, enables the County to enter into contracts with private landowners for the purpose of restricting land to agricultural or related open space use in return for lower property tax assessments.

The last sentence of the third paragraph under Section 4.2.2.5 “Williamson Act Land in the Planning Area,” has been revised as follows:

Two properties under Williamson Act contract are located along the northern edge of the Planning Area; two are west of SP-3; two are adjacent to SP-1C; three are adjacent to SP-1B; ~~and one is adjacent to the Spring Lake Specific Plan area;~~ and one is adjacent to the southeast corner of the Planning Area.

#### 3.5.2 PAGE 4.2-11 REVISIONS:

The heading text for Section 4.2.3 has been revised to read, “4.2.3 Regulatory ~~Setting~~Framework”

#### 3.5.3 PAGE 4.2-29 REVISIONS:

Table 4.2-8 has been revised as follows:

**Table 4.2-8. Acres of Each Type of Farmland in SP-1, SP-2, and SP-3**

Type	SP-1	SP-2	SP-3
Prime Farmland	<del>134.57</del> <u>0.3</u>	0.0	213.29
Farmland of Statewide Importance	0.0	374.9	0.0
Unique Farmland	0.0	393.5	0.0
<i>Total Important Farmland</i>	<del>134.57</del> <u>0.3</u>	768.4	213.29
Other Farmland	<del>0.0</del> <u>31.3</u>	66.43	59.13

Sources: Farmland Mapping and Monitoring Program 2012; City of Woodland 2013; Yolo County 2013; SACOG Mapping Center 2014; Dyett & Bhatia 2013

The third paragraph after Table 4.2-9 has been revised as follows:

Table 4.2-10 shows the Planning Area’s existing inventory of Prime, Important, and Unique Farmland, the projected losses resulting from buildout of the East Alternative, and the percentage change by type of farmland. Overall, implementation of the East Alternative would result in the conversion to urban uses of ~~1,542~~64 acres (or 65 percent) of the existing Prime, Important, or Unique Farmland within the Planning Area comprised of 1,339 acres classified as Prime Farmland, 38 acres classified as Farmland of Statewide Importance , and 184 acres classified as Unique Farmland. The remaining farmland in the Planning Area would be in portions of SP-1B

(north of the highway interchange), SP-1C, and portions of SP-2 (approximately 75 percent of the Specific Plan area, which would not be developed in the planning horizon).

### 3.5.4 PAGE 4.2-30 REVISIONS:

Table 4.2-10 has been revised as follows:

**Table 4.2-10. Important Farmland Change in the Planning Area – East Alternative**

Type	Existing Acres	Change (Acres Converted)	Remaining Farmland Acres at General Plan Horizon Year (2035)	Percent Change By Type
Prime Farmland	1,544.76	1,338.87	205.9	87%
Farmland of Statewide Importance	401.1	37.7	363.4	9%
Unique Farmland	434.9	165.784.3	269.2250.6	3842%
<i>Total Important Farmland</i>	<i>2,380.76</i>	<i>1,542.260.8</i>	<i>838.549.8</i>	<i>6566%</i>

Sources: Farmland Mapping and Monitoring Program 2012; City of Woodland 2013; Yolo County 2013; SACOG Mapping Center 2014; Dyett & Bhatia 2013

### 3.5.5 PAGE 4.2-35 REVISIONS:

The second paragraph under the heading, “Summary of Impact Analysis,” has been revised as follows (the word “City” is added in the fourth sentence):

The ULL was adopted for the purpose of permanently circumscribing development and preserving surrounding agricultural lands. This action of the voters identified those lands intended to be converted to urban uses over time in the form of an urban limit line and permanently protected lands outside of that boundary. Ballot initiatives are not subject to environmental impact review under CEQA and therefore the 2006 action by the voters did not include an assessment of the impacts resulting from the urban limit line. As enacted by the voters, Policy 2.A.1 prohibits City public services and facilities beyond Woodland’s ULL. In addition, Policy 2.A.3 requires agricultural mitigation of farmland within the ULL at a rate of one acre of permanently conserved farmland for every acre converted to urban development or non-agricultural uses. The policy does not specify conservation of the same type of farmland, therefore loss of Prime Farmland could be mitigated with the conservation of Farmland of Local Importance. Goal 7.6 prioritizes the preservation of agricultural land, and Policy 7.C.1 requires the City to minimize the amount of annexed land.

Under item “a”, the following revision was made:

The East Alternative anticipates growth that will result in the loss of 1,560.842.2 acres of Prime, Important, or Unique Farmland. The impact is **significant**.

### 3.5.6 PAGE 4.2-36 REVISIONS:

The third paragraph under “Potential Impacts Associated with Implementation of the Proposed Project,” has been revised as follows:

There is no land within the Planning Area under active Williamson Act contracts. However, as of FY 2010/2011, there are eleven properties under Williamson Act contracts adjacent to the Planning Area and several properties near the Planning Area. As shown in Exhibit 4.2-2, ~~two properties are located north of the Planning Area adjacent to land that is designated Flood Study Area; two are located west of SP-3 and adjacent to land that is already developed; and one is south of the Spring Lake Specific Plan;~~ two properties under Williamson Act contract are located along the northern edge of the Planning Area; two are west of SP-3; two are adjacent to SP-1C; three are adjacent to SP-1B; and one is adjacent to the Spring Lake Specific Plan area; and one is adjacent to the southeast corner of the Planning Area. None of these properties are expected to be adversely affected by the Proposed Project. The 2035 CAP does not have elements that are distinct from the overall Proposed Project as it relates to this impact and is included in the analysis below.

### 3.5.7 PAGE 4.2-42 REVISIONS:

Mitigation Measure 4.2.-3 is revised as follows:

- **Policy 7.C.5 Agricultural Buffer.** Require new development that occurs at the edge of the ULL to be set back a minimum of 300 feet from adjacent agricultural land where possible. ~~Exceptions and alternative means~~ Equivalent means of providing agricultural buffers may be considered by the Planning Commission on a case by case basis for parcels where development potential would be precluded or severely limited as a result of the required buffer size. The buffer shall be landscaped/vegetated and may include public right of way.

## 3.6 CHAPTER 4.3, “AIR QUALITY”

### 3.6.1 PAGE 4.3-12, 4.3-21, 4.3-22, 4.3-26, AND 4.3-27 REVISIONS:

References throughout this Section to Appendix D have been revised to Appendix C.

### 3.6.2 PAGE 4.3-16 REVISIONS:

The first paragraph under the heading, “Air Quality Plans,” has been revised as follows:

In compliance with CCAA requirements, the Sacramento Metropolitan Air Quality Management District (SMAQMD) in coordination with the YSAQMD, as well as the air quality management districts and air pollution control districts of El Dorado, Placer, and Sutter Counties prepared and submitted the 1991 Air Quality Attainment Plan (AQAP). The CCAA requires that these AQAPs are updated every three years to describe the progress made by the applicable air districts to achieve ambient air quality standards. The most current AQAP update was adopted in July 2016

adopted in April 2013; however, YSAQMD is currently in the process of finalizing the 2015 Triennial Assessment and Plan Update (YSAQMD 2016).

### 3.6.3 PAGE 4.3-20 REVISIONS:

The following footnote has been added:

<sup>10</sup> The YSAQMD notes that this threshold was adopted specifically for the evaluation of stationary source impacts and that it believes that this threshold can provide an accurate and conservative assessment of the significance of mobile source-related impacts from air toxics from mobile sources, such as diesel particulate matter. The YSAQMD also notes that no specific threshold of significance for toxic impacts has been adopted for mobile sources and that the 10 in one million threshold has been used by lead agencies for assessing mobile source impacts.

## 3.7 CHAPTER 4.5, “CLIMATE CHANGE, GREENHOUSE GAS EMISSIONS, AND ENERGY”

### 3.7.1 PAGE 4.5-4 REVISIONS:

Table 4.5-1 has been revised to add the following Footnote #3 with a callout to the row heading, “Wastewater Reuse”:

3 Wastewater reuse emissions result from agricultural applications in which organic material in the wastewater biodegrades to create CO<sub>2</sub> and N<sub>2</sub>O, among the byproducts. This includes tomato washing, processing, and canning at Pacific Coast Producers, and the spray application of this tomato process wastewater to fields using sprinkler and surface irrigation.

### 3.7.2 PAGE 4.5-22 REVISIONS:

Table 4.5-7 has been revised to add the following Footnote #1 with a callout to the row heading, “Wastewater Reuse”:

1 Wastewater reuse emissions result from agricultural applications in which organic material in the wastewater biodegrades to create CO<sub>2</sub> and N<sub>2</sub>O, among the byproducts. This includes tomato washing, processing, and canning at Pacific Coast Producers, and the spray application of this tomato process wastewater to fields using sprinkler and surface irrigation.

## 3.8 CHAPTER 4.9, “HYDROLOGY, FLOODING, AND WATER QUALITY”

### 3.8.1 PAGE 4.9-58 REVISIONS:

The following revisions have been made to the second paragraph under Impact 4.9-6:

In addition to residential growth, non-residential growth is expected in SP-3 and as infill development in existing neighborhoods. However, as discussed in Impact 4.9-5, before a Specific Plan can be processed for SP-3, a comprehensive flood solution must be identified with funding secured, consistent with DWR’s urban level of flood protection (Nov. 2013), and with

Government Code Sections 65007 (a-c), 65865 (a-c), 65962 (a-c), and 66474.5 (a-c) or as presently constituted.

### **3.8.2 PAGE 4.9-59 REVISIONS:**

The following revisions have been made to the first paragraph after Table 4.9-5:

- a. East Alternative–In addition to the impact disclosed in the general analysis presented above, new residential and non-residential growth is expected in SP-3 and SP-2 under the East Alternative. However, as discussed in Impact 4.9-5, before a Specific Plan can be processed for a flood hazard area, a comprehensive flood solution must be identified with funding secured, consistent with DWR’s urban level of flood protection (Nov. 2013), and with Government Code Sections 65007 (a-c), 65865 (a-c), 65962 (a-c), and 66474.5 (a-c) or as presently constituted.

The following revisions have been made to the first paragraph after Table 4.9-6:

- a. South Alternative–In addition to the impact disclosed in the general analysis presented above, new residential and non-residential growth is expected in SP-3 and SP-2 under the East Alternative. However, as discussed in Impact 4.9-5, before a Specific Plan can be processed for a flood hazard area, a comprehensive flood solution must be identified with funding secured, consistent with DWR’s urban level of flood protection (Nov. 2013), and with government code sections 65007 (a-c), 65865 (a-c), 65962 (a-c), and 66474.5 (a-c) or as presently constituted.

## **3.9 CHAPTER 4.10, “LAND USE PLANNING, POPULATION, AND HOUSING”**

### **3.9.1 PAGE 4.10-10 REVISIONS:**

A heading has been revised as follows:

**Local Area Agency Formation Commission 2011 City of Woodland Municipal Service Review**

### **3.9.2 PAGE 4.10-19 REVISIONS:**

The paragraph under the heading, “East Street Corridor Specific Plan, 1998, Revised 2005,” has been revised as follows:

The East Street Corridor Specific Plan was adopted in 1998, with a minor revision in 2005. The intent of this Plan is to enhance the East Street Corridor as a mixed-use residential, shopping, service, and community district. East Street functions as an important north-south connection through Woodland’s eastern neighborhoods and provides access to the city’s northeast industrial sector. Generally, this Plan focuses on encouraging new types of development that create an active community node, enhancing the public realm to make it a more attractive place to gather and conduct business. As discussed in the Project Description under Section 3.9, following

adoption of the 2035 General Plan, the City will begin the process of updating active specific plans, master plans, and other implementation documents to be consistent with the new plan, and reflect the adopted policy language, and design and development guidance. This will include repeal of the East Street Corridor Specific Plan, because the City has deemed that the 2035 General Plan will better meet the community's goals for the East Street Corridor than the Specific Plan that was adopted in 1998.

### 3.9.3 PAGE 4.10-28 REVISIONS:

A typo has been revised in the fourth paragraph under Table 4.10-7, as shown below:

As detailed throughout this EIR, two Alternatives are analyzed for planning horizon year (2035). The Alternatives offer different approaches regarding the timing, location, and sequence under which the Planning Area could build out through 2035, particularly in terms of “greenfield” growth. One Alternative introduces new greenfield growth in the East while the other continues to concentrate new greenfield growth in the South. The two Alternatives have different phasing of new growth. This could be considered a type of growth-inducing impact, as well, if in adopting a 2035 General Plan for one Alternative, the greenfield development that had been envisioned within only the Alternative somehow becomes more attractive or likely. This is not an outcome that could be ~~enviromed~~envisioned under the auspices of the 2035 General Plan, since there is very specific policy regarding phasing that would not allow this to occur, but the City has elected in this case to conservatively disclose this possible indirect effect notwithstanding the countervailing policy language.

## 3.10 CHAPTER 5, “ALTERNATIVES”

### 3.10.1 PAGE 5-25 REVISIONS:

The discussion related to aesthetics and visual resources has been revised as shown below:

In addition, all three Alternatives plan for greenfield development, which affects the visual character of Woodland. To estimate the change in greenfield development, Table 5-6 shows the projected change in total amount of farmland that would be converted under each Alternative, including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Farmland of Local Potential, and Grazing Land, that would be converted in new growth areas under each Alternative. The No Project Alternative would convert the least amount of farmland ~~in new growth areas~~ (2,575 ~~1,020~~ acres), and the East and South Alternatives would both convert similar amounts. The East Alternative would convert 2,968 ~~1,253~~ acres, and the South Alternative would convert 3,026 ~~1,219~~ acres. The different areas of the Planning Area affected by growth are explained below.

- ▶ Southern area of ULL: A significant portion of the growth expected under each Alternative is in the southern area of the ULL. The East Alternative includes ~~anticipates~~ growth in SP-1A and portions of SP-1B, the South Alternative includes ~~anticipates~~ growth in all of SP-1C, and the No Project Alternative includes ~~anticipates~~ growth in the northern portion of this area. Therefore, the South Alternative would allow plans for the most greenfield development in this area, and the East Alternative would allow plans for the least.

- ▶ Eastern area of ULL: The No Project Alternative designates this area Urban Reserve. Both the East and South Alternatives assume plan for greenfield development along County Route 102 and I-5, and the Eastern Alternative includes plans for greenfield development in portions of SP-2. Therefore, the East Alternative allows plans for the most greenfield development in this area, and the No Project allows plans for the least amount.
- ▶ Northern area of ULL: The No Project Alternative land use diagram leaves Undesignated most of the land that the East and South Alternatives designate FSA. All three Alternatives assume plan for growth in the areas labeled SP-3A and SP-3B. Therefore, all three Alternatives have similar impacts in the northern portion of the ULL.

**Table 5-6. Acres of All Farmland and Grazing Land Prime, Statewide, Unique Farmland Converted in New Growth Areas in Each Alternative**

	No Project Alternative	East Alternative	South Alternative
SP-1	<u>560.5</u> <del>618.2</del>	501.4 516.6	<u>731.6</u> <del>816.4</del>
SP-2	0.0	172.5 334.6	0.0
SP-3	<u>272.4</u> <del>402.1</del>	272.4 402.1	<u>272.4</u> <del>402.1</del>
Land Outside Specific Plan Areas	1,741.9	<u>2,022.0</u> <del>1,253.3</del>	<u>2,022.0</u> <del>1,2218.5</del>
<b>Total</b>	<b><u>2,574.8</u></b>	<b><u>2,968.4</u></b>	<b><u>3,026.0</u></b>

Note: Table 5-6 estimates the amount of all farmland that will convert under each Alternative, including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Farmland of Local Potential, and Grazing Land.

Source: Farmland Mapping and Monitoring Project 2012; City of Woodland 2013; Yolo County 2013; SACOG Mapping Center 2013; Dyett & Bhatia 2016.

### 3.10.2 PAGE 5-26 REVISIONS:

Paragraph two under the heading, “5.5.2 Agriculture” has been revised as shown below:

Table 5-7 shows the approximate amount of farmland expected to be converted under each Alternative. These values are estimates—the exact footprint of future development and the amount of farmland converted is not known. This assumes that for each Alternative, farmland that is in an area anticipated for development will be converted, even if the farmland is in a Flood Study Area. Assuming that all of the Flood Study Area farmland is ultimately converted represents a conservative approach, because it is not known how much of the land in the Flood Study Area may ultimately be required for flood-related infrastructure; portions of it may well remain as farmland in perpetuity. The No Project Alternative is expected to result in the conversion of the least amount of Important Ffarmland (1,262 acres). The East Alternative is expected to result in the conversion of approximately 1,542 ~~561~~ acres of Important, fFarmland, and the South Alternative is expected to result in the conversion of approximately 1,612 acres of Prime, Important, or Unique farmland. Therefore, the East Alternative is expected to result in the conversion of 70 ~~50~~ fewer acres than the South Alternative.

### 3.10.3 PAGE 5-27 REVISIONS:

Table 5-7 has been revised as shown below:

**Table 5-7. Acres of Important Farmland Converted in Each Alternative**

	No Project Alternative	East Alternative	South Alternative
Prime Farmland	1,232	1,339	1,545
Farmland of Statewide Importance	3	38	26
Unique Farmland	27	<del>166</del> <b>184</b>	41
Total Prime, Statewide, Unique Farmland	1,262	<del>1,542</del> <b>1,564</b>	1,612

Source: Farmland Mapping and Monitoring Project 2012; City of Woodland 2013; Yolo County 2013; SACOG Mapping Center 2013; Dyett & Bhatia 2016.

### 3.10.4 PAGE 5-35 REVISIONS:

The fourth paragraph under the heading, 5.5.4, “Biological Resources,” has been revised as follows:

The Proposed Project designates ~~617~~ 873 acres of Open Space and 521 acres of Flood Study Area that currently consist of annual grasslands, alkali prairie, freshwater wetlands, open water, and existing parks and habitat preserves. Existing habitats would be retained in the designated Open Space areas and some of these lands (i.e., Woodland Regional Park) would be placed under permanent conservation easements. Under the No Project Alternative, the Woodland Regional Park is also designated as Open Space, but parcels to the north that also contain sensitive alkali prairie and freshwater wetlands and other natural habitats are designated as Urban Reserve. While these lands would not be designated as Open Space under the No Project Alternative, it is assumed that they would not be developed within the 2035 planning horizon and would continue to provide similar habitat functions as under the existing condition. In addition some of these areas are already protected habitat preserves (i.e., the City of Woodland Preserve and the Spring Lake Alkali Sink preserve).

### 3.10.5 PAGE 5-35 REVISIONS:

The paragraph under the heading, “Giant Garter Snake,” has been revised as follows:

Giant garter snake is known to occur in the vicinity of the Planning Area and has been documented in drainages that are connected to the Planning Area, particularly in the Yolo Bypass and Willow Slough near SP-2. Implementing the No Project Alternative would allow development in areas containing agricultural ditches and other waterways that provide dispersal habitat and possibly resident habitat for giant garter snake. Implementing the No Project Alternative would not result in loss of cultivated rice fields that provide suitable habitat for giant garter snake. Conversely, implementing the East Alternative would allow conversion of approximately ~~472~~ 182 acres of cultivated rice fields that provide suitable habitat for giant garter snake in SP-2. Loss of rice fields would not happen with implementation of either the No Project Alternative or the South Alternative. All three Alternatives would allow development in areas containing agricultural ditches and other waterways that provide dispersal habitat and possibly resident habitat for giant garter snake. Therefore, based on this analysis, the No Project Alternative would have a substantially lower level of potential impact to giant garter snake than the East Alternative or the South Alternative.

### 3.10.6 PAGE 5-36 REVISIONS:

The second paragraph of Section 5.5.5.1 “Generation of Greenhouse Gas Emissions,” has been revised as follows:

Each of the Alternatives would generate short-term construction-related GHG emissions. Construction-related activities, such as site preparation (e.g., excavation, grading, and clearing), demolition and renovation, building construction, and grading among others would require the use of off-road equipment, material delivery trucks, and construction worker vehicles that would result in temporary exhaust emissions. This includes construction emissions associated with development in addition to short-term emissions associated with equipment upgrades, renewable energy facility installations, energy efficiency building upgrades, tree planting, and other measures included in the City’s 2035 CAP. ~~Since~~ The No Project Alternative would include less development than the East and South Alternatives in terms of number of dwelling units, added population, amount of new non-residential square footage, and number of employees. Since the amount of building activity under the No Project Alternative is lower than the East and South Alternatives, during this phase of construction, short-term GHG emissions would be lower. However, the acreage of land disturbed during construction also factors into the level of short-term air pollutant emissions – if an alternative has a greater land area subject to development, this would require more grading and site preparation, and the amount of total GHG emissions associated with this phase of construction activity would be higher.

### 3.10.7 PAGE 5-49 REVISIONS:

The fifth paragraph under Section 5.5.10.2 “Population and Housing,” has been revised as follows:

The South Alternative assumes a total population of approximately 19,300 people, 7,000 dwelling units, 18,210 local jobs, and 16.7 million square feet of nonresidential development. Therefore, the South Alternative is projected to generate less employment than the East Alternative, the same population growth as the East Alternative, and more population and employment growth than the No Project Alternative (Table 5-17). Compared to the East Alternative, more non-residential development would occur within the Downtown area, and no ~~non-residential~~ development would occur in SP-32 (Table 5-3).

### 3.10.8 PAGE 5-62 REVISIONS:

The second line under Section 5.6 “Summary of Comparative Effects of the Alternatives has been revised as follows:

≥<More overall impact than the comparison Alternative

### 3.10.9 PAGE 5-63 REVISIONS:

In Table 5-24 Environmental Topic, “Climate Change, Greenhouse Gas Emissions, and Energy,” has been revised as follows:

Climate Change, Greenhouse Gas Emissions, and Energy	> East Alternative > South Alternative	< No Project Alternative > ≡ South Alternative	< No Project Alternative = East Alternative
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### 3.11 CHAPTER 6, “OTHER CEQA CONSIDERATIONS”

#### 3.11.1 PAGE 6-37 REVISIONS:

The second paragraph after Table 6-6 has been revised as follows:

Policies in the 2035 General Plan and mitigation described within the environmental topic-specific sections of this EIR reduce potential effects associated with both residential and non-residential development within the Planning Area assumed under the Cumulative Scenario. The City’s Urban Limit Line (ULL) and associated policies are designed to manage growth within the Planning Area to avoid adverse effects, such as unplanned development indirectly facilitated by planned development within the ULL. The City’s ULL can only be modified by the voters. While ~~the City’s policies~~ voter-approved ULL prevents conversion of additional agricultural land outside of the ULL, the City could increase land use density/intensity to allow for additional development to meet demand and/or neighboring jurisdictions may experience increased demand for additional development as a result. For these reasons this impact is significant and unavoidable.

## 4 MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires public agencies to report on, and monitor measures adopted as part of the environmental review process (see Public Resources Code Section 21081.6 and CEQA Guidelines Sections 15091[d] and 15097).

The EIR identifies all relevant, feasible mitigation measures necessary to mitigate potentially significant and significant impacts attributable to the Proposed Project (the General Plan and the Climate Action Plan). Each of these measures to reduce environmental effects has been incorporated into the Proposed Project and therefore will be implemented and enforced through the implementation of the General Plan and Climate Action Plan.

Public Resources Code Section 21081.6(b) and Section 15097(b) of the CEQA Guidelines establish that when the project examined in an EIR is a general plan, specific plan, community plan, or other plan-level document (such as a climate action plan), mitigation measures may be incorporated into the plan. This is the approach that has been taken by the City.

Section 150797(b) of the CEQA Guidelines specifies that the monitoring plan may consist of policies in the plan-level document, and that the “annual report on general plan status required pursuant to the Government Code is one example of a reporting program for adoption of a city or county general plan.” The annual report required pursuant to Government Code Section 65400 (a)(2) fulfill this component of the monitoring requirement.

In addition pursuant to Implementation Program 7.6 in Appendix A of the Draft General Plan, the City will evaluate progress and update the Climate Action Plan as necessary to achieve the City’s greenhouse gas emission reduction target. The City will prepare a summary report that outlines progress toward Climate Action Plan strategies and actions. A comprehensive Climate Action Plan evaluation should occur on no greater than a five-year cycle. The City may deliver this report in conjunction with the State-required annual report to the City Council regarding implementation of the City’s General Plan.

As required by Section 21081.6(a)(2) of the Public Resources Code, the City of Woodland Community Development Department is the “custodian of documents and other material” that constitute the “record of proceedings” upon which the decisions related to the Proposed Project are based. Inquiries should be directed to:

City of Woodland Community Development Department  
300 First Street  
Woodland, CA 95695  
(530) 661-5820

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# **APPENDIX A**

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Urban Limit Line Ballot Measure



TOP

E

**OFFICIAL BALLOT**  
**CONSOLIDATED**  
**GENERAL ELECTION**  
**COUNTY OF YOLO**  
**TUESDAY, NOVEMBER 5, 1996**

This ballot stub shall be torn off by precinct board member and handed to the voter.

**MEASURE SUBMITTED TO VOTE OF VOTERS**

**CITY**

**CITY OF WOODLAND**  
**GENERAL PLAN REFERENDUM**  
**MEASURE B**

**B** Shall Resolution No. 3944, approved by the Woodland City Council on February 27, 1996, entitled "Resolution of the City Council of the City of Woodland Certifying The Environmental Impact Report for the General Plan, Making Findings, and Adopting the General Plan for the City of Woodland," be adopted?

YES	+
NO	+

Sample Ballot

Sample Ballot

57-503E

E



**IMPARTIAL ANALYSIS BY CITY ATTORNEY  
GENERAL PLAN REFERENDUM  
CITY OF WOODLAND MEASURE B**

Measure B, if approved, would make effective City of Woodland Council Resolution No. 3944 adopting the 1996 General Plan. By law, every city and county in California must adopt and keep current a long term, comprehensive general plan. The city of Woodland's previous 1988 General Plan has been in effect since qualification of the referendum petition protesting Resolution No. 3944. The 1988 General Plan consists of nine elements: Land Use, Circulation, Housing, Open Space, Conservation, Noise, Safety, Parks and Recreation, Historic Preservation, and Level of Service Plan. The 1996 General Plan is a comprehensive update of these elements except for the Housing Element, which was updated in 1993.

The primary differences between the 1988 General Plan and the 1996 General Plan are described below:

1. **Time Frame.** The 1988 General Plan has a 22-year time frame, from 1988 to 2010. The 1996 General Plan would set a 25-year time frame, from 1995 to 2020.

2. **Population.** The 1988 General Plan projects population of 60,700 in the year 2010, a growth rate of 2.25% annually. The 1996 General Plan would limit population growth to average 1.7% annually, to 60,000 in 2015 and 66,000 in 2020.

3. **Urban Limit Line and Planning Area Boundaries.** The Urban Limit Line defines the area in which development is allowed. The 1988 General Plan encompasses approximately 7,850 acres within the Urban Limit Line. The 1988 General Plan also designates four study areas outside of the Urban Limit Line between the southernmost city limits and CR25A between CR98 and CR102. Development within the study area can only occur after an assessment is made demonstrating that development of the area is needed and the General Plan is amended to include the land within the Urban Limit Line.

The 1996 General Plan would expand the Urban Limit Line to the south and southeast, increasing the developable land by approximately 1,620 acres — 550 acres for residential, 70 acres for commercial, 650 acres for industrial/business park and 350 acres for public/open space. A portion of the study area of the 1988 General Plan has been included within the 1996 Urban Limit Line. Lands excluded are located between CR98 and College Street and the land between College Street and SR113 one-half mile north of CR25A. The 1996 General Plan also would designate land east of CR102, south of I-5 as an urban reserve area. No development of the urban reserve area would be allowed by the 1996 General Plan until a feasibility study was prepared to determine if and what kind of development is feasible for that area.

4. **Area North of Kentucky Avenue.** The 1988 General Plan designates the area north of Kentucky Avenue and west of I-5 for residential development. Because of flood hazard issues, the 1996 General Plan would designate this area primarily for industrial, business park, and service commercial development.

5. **New Policy Sections.** The 1996 General Plan includes new policy sections not found in the 1988 General Plan. These policies address:

- Preservation and enhancement of existing neighborhoods.
- Economic development.
- Child care.
- Family and youth.
- More comprehensive parks and recreational facilities policies and standards.
- More extensive policies guiding provision of public facilities and services.

s/ Ann M. Siprelle  
City Attorney  
City of Woodland

**The above statement is an Impartial Analysis of Measure B. If you desire a copy of the measure, please call the City Clerk's Office at 661-5806 and a copy will be mailed at no cost to you.**

**ARGUMENT IN FAVOR OF MEASURE B**

**VOTE "YES" ON "MEASURE B" TO SUPPORT OUR GENERAL PLAN. A "YES" VOTE MEANS "NOT A PENNY MORE."**

**SAVES TAXPAYER MONEY** - \$500,000 of taxpayer dollars was invested in the General Plan. Changing the Plan could cost taxpayers an extra \$600,000 or more!

**SAVES PRIME AG LAND** - preserving the prime soil to Woodland's south, north, and west by moving growth to poor soils below Yuba College.

**PROTECTS WOODLAND NEIGHBORHOODS** - by moving traffic away from existing homes. Changing the Plan could open 4-lane streets across southern Woodland - driving traffic and congestion into our neighborhoods.

**PROMOTES SLOW GROWTH** - For the first time in Woodland's history, this General Plan limits growth restricting it to only 1.7% per year, slower than Davis.

**RESPONSIBLE GOVERNMENT** - 57 public meetings were held to create this General Plan. The planning commission and City Council agreed on 100% of plan policies and 74% of land use designations.

**A "NO" VOTE MEANS HIGHER COSTS.**

**FLUSHES \$500,000 OF TAXPAYER MONEY DOWN THE DRAIN** - We can't afford to fix the streets and they want to waste \$600,000!

**OPENS DOOR TO MASSIVE GROWTH** - The largest proposed project in Yolo County history lies east of Woodland. The General Plan denied it. Changing the Plan could double the size of Woodland if the project were approved.

**COULD INCREASE YOUR TAXES** - To help develop to the east, referendum advocates want to move our sewer plant. Price tag? \$30 million or more! Don't give them a blank check!

**PUTS POLITICS AHEAD OF PLANNING.** The General Plan puts planning first, not politics. Stop the politicians. Save our tax dollars.

**VOTE "YES" FOR PLANNING!**

**VOTE "YES" ON MEASURE B!**

**LET'S NOT SPEND A PENNY MORE!**

s/ Jan Hicks

Woodland City Planning Commissioner 1985-1995

s/ Dave Flory, City Council Member, City of Woodland

s/ Dick Klenhard, Retired Executive Vice-President  
Woodland Chamber of Commerce 1965-1990

s/ Kenneth E. Trott, Land Conservationist

s/ Julie Matteoli-Farnham, Life Long Woodland Resident/  
Downtown Business Woman

**REBUTTAL TO ARGUMENT IN FAVOR OF MEASURE B**

Yes, the politicians and developers have done it again. They've taken the facts and distorted them to fit their own needs.

The fact is that the Woodland General Plan Final Environmental Impact Report shows 1302 acres within the southern residential area, of which there are 1162 acres classified prime farmland, 55 acres of statewide importance and 85 acres of local importance. Thus growth below (or south) of Yuba College is essentially growth on prime soils.

The fact is that after the 57 General Plan public meetings, the City Council adopted a plan that their Operation and Maintenance Fiscal Analysis concludes will result in yearly revenue shortfalls. These six figure annual deficits begin in just four years (in year 2000)!

The fact is that the City Council made these decisions without adequately studying the significant potential income from 900 acres of non-prime land controlled by the City east of County Road 102. The taxpayers of Woodland were denied the opportunity for income, lower taxes and lower fees with the future development of these lands.

Vote your common sense.

Just Say No! to a plan that almost exclusively uses prime agricultural land.

Just Say No! to a plan that guarantees annual deficits beginning in the year 2000.

Just Say No! to politicians and developers who ignore the possible benefits of growth to the east.

Just Say No! to the 1996 General Plan.

Just Say No! to Measure B.

s/ Elaine Rominger, Mayor

s/ Georgia Cochran, Woodland Resident

s/ Wally Foster, Councilmember 1976-1980

**ARGUMENTS IN SUPPORT OF OR IN OPPOSITION TO THE PROPOSED LAWS ARE THE OPINIONS OF THE AUTHORS AND HAVE NOT BEEN EDITED FOR CORRECTNESS BY ANY PUBLIC AGENCY.**



## ARGUMENT AGAINST MEASURE B

The 1996 General Plan was adopted by the City Council by a 3-1 vote. However all of the possible alternatives for growth for the next 25 years were not studied or given full consideration. Without any substantive basic information, three councilmen eliminated consideration of growth to the east (non-prime farmland). Instead, these three councilmen voted to grow houses, rather than food, on the prime agricultural lands which lie to the south of Woodland. The 1996 General Plan would convert 1,162 acres of prime land. Evaluation of areas to the east of the city would only involve approximately 336 acres of prime land. Once cemented over, good agricultural land cannot be reclaimed.

Two recent opinion polls and the testimony of many citizens at public hearings and town hall meetings were ignored. The people of Woodland want to protect and preserve the prime farmland on our borders. This confirms the long-standing growth policy of our city.

Woodland's unique rural character and precious farm heritage are in danger of being lost forever.

Join us in affirming the importance of prime agricultural farmland. Reject the 1996 General Plan by voting "NO"!

s/ Elaine Rominger, Mayor  
City of Woodland  
s/ Calvin A. DeKnikker  
s/ Eric D. Paulsen  
s/ Wallace W. Foster  
s/ Georgia Cochran

## REBUTTAL TO ARGUMENT AGAINST MEASURE B

A "Yes" vote on Measure B is a vote for fiscal sanity. \$500,000 has already been spent! Those opposed to Measure B want to spend \$600,000 more on needless studies! It's time for Common Sense! Wouldn't that money be better spent on maintaining our roads than expensive consultants?

Contrary to opposition claims:

**The General Plan preserves prime ag land by:**

- Directing growth to poor soils in the Southeast. 60% of the General Plan area is poor soils.

—Adopting the Mayor's Agriculture Subcommittee's recommendations, including:

- Reduced growth rate to 1.7% per year
- Permanent urban limit line concept to stop growth
- Conservation easements to save ag land

**The East was studied!** The clear majority of the City Council and the entire Planning Commission rejected growth to the East due to deep-water flooding and toxics dangers!

These compelling studies include:

- General Plan Technical Report
- U.S. FEMA Map
- U.S. Corps of Engineers Westside Tributaries Report
- Assessment Report for Reclamation District 2035
- Interagency Floodplain Committee
- Sewer Plant study

It's all politics and money!

- The only "no" vote on the General Plan occurred when Mayor Rominger flip-flopped on the last day and changed her vote! For 37 months she had supported the Plan and had voted for it twice before!
- The biased "polls" the Mayor cites were not City polls. They were paid for by big developers from PG&E and Orange County.
- Every person who signed the opposition's argument lives in a home built on prime soil.

**Vote "Yes"! Not a Penny More!**

s/ Jan Hicks  
s/ Dave Flory  
s/ Dick Klenhard  
s/ Julie Matteoli-Farnham





